Matt...

This is a listing of documents that Toeroek has been storing for us since some time after the Libby trial – we think that many of these should be in the file and/or archived at NARA rather than Toeroek holding on to them. We plan to keep all the WR Grace 104(e) info with Toeroek for the forseeable future (or until we run out of money). But, we wanted to move these – please advise as to whether we can bring these documents to our Records Center and how we should handle them – thanks!

Thanks - k 4/12/13

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Barcode	Box#	Type of Document	Person(s)	Date Range	
748-000622-001	1	Pleadings and Exhibits in re Civil Action No. 01-72-M-DWM		GRAPH	740 000000 00
		Exhibits for U.S.'s Motion for Partial Summary Judgment on Response Costs and on Defendants' Second		doWAULT	748-000622-001
		Affirmative Defense (Volumes 1 and 3 / Exhibits 1 - 22, 31 - 42)		Beninçus Archives & Recurdo Atanagement	
		U.S.'s Motion for Partial Summary Judgment on Defendant's Third Affirmative Defense and Exhibits 1 18			
		U.S.'s Motion for Partial Summary Judgment on the Liability of W.R. Grace & CoConn. And on W.R. Grace & CoConn.'s First and Fourth Affirmative Defenses, Statement of Uncontroverted Facts, Brief in Support, Exhibit List, Volume 1 of 3: Exhibits (1 – 22)			
		Exhibits for Second Affirmative Defense (Volume 3 of 3, Exhibits 31 – 42)			
		U.S.'s Motion for Partial Summary Judgment on Defendant's Third Affirmative Defense, Brief in Support, Statement of Uncontroverted Facts, Exhibit List, Exhibits 1 – 18		10/11/2002	
		Exhibits for U.S.'s Motion for Partial Summary Judgment on the Liability of W.R. Grace & CoConn. And on W.R. Grace & CoConn.'s First and Fourth Affirmative Defenses			
		U.S.'s Motion in Limine to Strike Portion of the Proposed Testimony of Dr. Richard J. Lee, Brief in Support, Proposed Order, Exhibit List, Exhibits 1 – 10		10/11/2002	
		HRO letter enclosing W.R. Grace & Co. privilege logs, Defendants' Response to U.S.'s Motion in Limine to Strike Portions of the proposed testimony of Dr. Richard J. Lee, Exhibits A, B, 1 – 35, Defendants' Response to U.S.'s Motion in Limine to exclude the Expert Report and Testimony of Dale Jensen, Exhibits 1 – 14		10/31/2002	
748-000623-001	_ 2	Documents for Civil Action No. 01-72-M-DWM			
		Privilege log			
		Final draft of ISO International Standard for ambient air — determination of numerical concentration of inorganic fibrous particles scanning electron microscopy method		d8WAULT	748-000623-001
		R.J. Lee Group ISO data compiled from EPA Excel Spreadsheets		Belincis Archives & Richards Alangement	
		R.J. Lee Group Report: Analysis of January 2000 indoor and outdoor air samples			
		U.S. Motion for Partial Summary Judgment on Response Costs and on Defendants' Second Affirmative			LONDO DEN EMBRAZERAN DORTEN DAR
		Defense (Volumes 1 3 / Exhibits 1 42)		11/2/2002	•
748-000624-001	3	Pleadings for Various Actions/Reports/Correspondence/Deposition			
[Superfund reports/documents		6/0/1	
		Asbestos and health documents		#8WAULT	748-000624-001
		Fiber contamination of Vermiculites re Libby #1 — environmental research		Smiless Artifices & Records Management	
		Libby #1 Radiology Survey by Sebastien, et al., Cohort study of mortality		/############	NO AND AND AND ALL OF THE STATE
		Libby #2: Pleural effects			
		Exposure to Crocidolite and Mesothelioma		טייט טפט ויטוט	· · · · · · · · · · · · · · · · · · ·

Barcode	Box#	Type of Document	Person(s)	Date Range
		Exposure to Tremolite and Respiratory Cancer in New Caldonia: A Case Control Study		0/0/2000
		Progression of pleural and parenchymal disease		0/0/1997
		Vermiculite Producers and Users	1	9/0/1988
		X-ray evidence of increased asbestos exposure		0/0/2000
		Internal fax re causality		8/12/2002
		Internal fax re FOIA request in re CDC, NIOSH and ATSDR		8/22/2002
		Consolidated Arvin cases: CV-F-92-5068 OWW, CV-F-96-6226 OWW, and CV-F-96-6228 OWW		
		Findings of Fact and Conclusions of Law		5/24/2002
		CV-91-4098 EPA's Allocation Methodology re Non-site Specific Costs		10/15/1993
		No. 4:97 CV 1557 CDP Memorandum and Order		9/15/1999
		CV F 92-5373 Memorandum Opinionto Enforce Consent Decree	,	1/12/2000
		W.R. Grace Interests		6/10/2002
		EPA's Response to 12/21/2002 Comments from W.R. Grace re the Supplement to the Export/Screening Plant AR	,	
		W.R. Grace's Comments		12/21/2001
		Attorney-Client Privileged Response to W.R. Grace's Comments received 7/31/2002		8/11/2002
		W.R. Grace miscellaneous correspondence		4/14/1969 7/15/1985
		Superfund Audit Report - Phase 2 Sampling		5/15/2001
		Memo re Milwaukee Plant and MonoKote		8/1/1973
		U.S.'s Response to Defendants' Briefto reopen AR		10/22/2002
		Civil Action No. 01-72-M-DWM HRO's request for progress report re costs		10/17/2002
		U.S.'s Motion and Brief Requesting Leave to File Additional Factual Materials in Summary Judgment Replies		11/12/2002
		U.S.'s Reply to Defendants' Response to Motion for Partial Summary Judgment on Response Costs and Defendants' Second Affirmative Defense, attachments and exhibits		11/11/2002
		Memos, testimony, report		3/13/2000 6/2/2002
		Deposition of Arnold R. Brody		9/30/2002
		Tremolite report, HRO and DOJ correspondence re Civil Action No. 01-72-M-DWM		4/2/1985 10/11/2002
		W.R. Grace's Motion to Reschedule Pretrial Conference Date and supporting Brief		10/24/2002
		Memos, articles on asbestos		0/0/1993 - 10/1/2002
		Unsigned U.S.'s Unopposed Motion and Brief of the U.S. to withdraw certain claims with prejudice		0/0/2002
		Summary Report of particulate found after destruction of the World Trade Center		10/12/2001 .
		Health-based Soil Investigation Levels Australia		5/24/2002
		Civil Action No. 01-72-M-DWM (D. Mont.) Defendants' Reply to the U.S.'s Response to Defendants' Brief re Order to Require EPA to Reopen the AR and exhibits		10/31/2002
		U.S.'s Motion in Limine to Exclude the Expert Report and Testimony of Dale Jensen and exhibits and Brief and Proposed Order+B25		10/11/2002

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Barcode	Box#	Type of Document	Person(s)	Date Range
		Documents in re Civil Action No. CV-00-167-M-DWM and Civil Action No. 4-88-822 and		<u> </u>
748-000625-001	4			ļ
		Chapter 11, Case No. 01-01139(JKF)		
		Notice		2/8/2001
		Defendants' Prediscovery Disclosure Statement	 	
		Order		11/7/2000
		U.S. Preliminary Pretrial Statement and draft thereof		3/9/2001
		Joint Discovery Plan		
		Defendants' Motion to Transfer Venue to the District of Delaware		714710004
		<u></u>		7/17/2001
		U.S.'s Unopposed Motion and Brief for Extension of Time to Respond to Defendants' Motion and Proposed Order		7/27/2001
-		W.R. Grace's Preliminary Pretrial Statement		8/29/2001
		Order		9/6/2001
		Defendants' Unopposed Motion for Conducting Preliminary Pretrial Conference by Telephone		10/4/2001
		Proposed Order		10/0/2001
		Signed Order		10/5/2001
		Notice of Lodging, Consent Decree .		10/23/2001
		Signed Order re oral argument		12/5/2000
		Signed Order re telephonic status conference		10/15/2001
		Oral Argument - Transcript of Proceedings between EPA and W.R. Grace		12/20/2000
		,		
-		Bankruptcy case documents in re Chapter 11, Case No. 01-01139(JKF)		5/10/2002
		Bankruptcy case documents in re Chapter 11, Case No. 01-01139 and Case No. 01-01200		
		Western Minerals Site – map and sampling data (Rec of Comm)		3/27/2002
		Toeroek Analysis of W.R. Grace's Response to EPA's 6th 104(e) Information Request		9/5/2001
		Measurement of Asbestos Air Pollution Inside Buildings Sprayed with Asbestos		8/0/1980 7/9/2001
	,	Bureau of Mines report, "Selected Silicate Minerals and their Asbestiform Varieties" by Campbell, et al.		
		Expanding Plants information		6/14/1961 - 7/19/2000
		ASTM International 2002 Johnson Conference: A Review of Asbestos Monitoring Methods and Results	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	
	- [for the New York World Trade Center, etc.		7/21/2002 7/25/2002
		Raintree Nursery-Mel and Lerah Parker and family-miscellaneous letters, pictures, information		3/0/2000 — 4/28/2001
		Civil Action No. 4-88-822 Access Case Harris Jorgensen and Isabel Jorgensen v. Carey-Canada, Inc., et al. documents		
		Fibers for Mark Raney	· · · · · · · · · · · · · · · · · · ·	9/23/2002

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Barcode	Box#	Type of Document	Person(s)	Date Range
		Libby timeline		4/19/2002
		Summary of Agency Risk Issues for Libby, Montana		2/7/2002
		Superfund Program Management		2/0/1995
		CERCLA original copies		

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		MATT'S MISCELLANEOUS BOXES			
748-000626-001	1	Concordance slay at Tourch			stay at
		Adapter, Concordance Dataflight software, Concordance Information Retrieval System handbook, related manuals and guides			To exisen
748-0 00827- 001	2	Toeroek's CD's - stay at Toerolk			740 0000
		CD's of extra copies of Libby Site file		dodaULT brings Arching & Records Management	748-000627-001
627 748-000628-001	3	Duplicates from Libby Asbestos File Review			
		W.R. Grace's Comments to EPA's 3rd Action Memo with exhibits and attachments		S THEMPTO WHEN	GULFACKINGUSTA
748-000629-001	4	Deposition and Notes/Reports/Analyses/Operating Procedures			•
		Deposition of Lee Lee Preliminary Report		EVALUT.	748-000629-001
		Standard Operating Procedures, core samples, soil samples, air samples, Silica analyses, SAED studies, deposition notes for Rich Lee, C. Weis and Meeker, analyses of air samples, Lee's Expert Report, ISO EDS reports, AHERA EDS reports, airborne asbestos methods, Asbestos Investigation grids, OSHA		docatori	/48-000829-001
		health effects and other files, RJLG-NVLAP, Lee CV and Publication List		7/18/1977 — 9/11/2002	
748-000630-001	5	Loose Documents		- QVAINT	748-000630-001
		Document database, briefs, reports, analyses, grids, letter re status of AR, test reports and results, memos, log of WRG's privileged documents		E Bosiness Archives & Broads Management	7-10-00000-001
	-				

Barcode	Dav. #	Type of Document	Down on (a)	Data Banga	
Baicode	DOX#	T Document	Person(s)	Date Range	
nat delivered	Note- book	United States' Designation of Experts: Arnold R. Brody, Ph.D., James E. Lockey, M.D., MS, Gregory P. Meeker, James R. Millette, Ph.D., Fredric L. Quivik, Ph.D., Alan C. Whitehouse, M.D., Wiley Wright III, CPA, Charles Young		7/31/2002	
748-000631-001	1	Finstad v. W.R. Grace and Company	+		
		Employee Exposure Summaries	1	3/	749 000624 004
		Finstad v. W.R. Grace and Company Transcript of Proceedings	† · · · · · · · · · · · · · · · · · · ·	3/ d8 WA UL	748-000631-001
		Finstad v. W.R. Grace and Company Appeal Exhibits Volumes I and II		Endlant Archives & Records Manag	
		Finstad v. W.R. Grace and Company Transcript of Proceedings	1	5/6/199	
		The state of the s	 		TO TOTAL TO MANAGE TO AN AND AND READ AND AND AND AND AND AND AND AND AND A
748-000632-001	2	Employee Exposure Summaries	1		
		Employee Exposure Summaries		3/	748-000632-001
				dowauL	T 746-000632-001
748-000633-001	3	Corporate Documents		Maniness Archives & Escouds blance	rand Historia din bulka di sul aprobanca da As
		W.R. Grace corporate documents Plaintiff's Brief in Opposition of Defendant's Motion to			
		Dismiss and exhibits	1	9/	I 18 x CERTEAT NEAT END TOUR LET UT.
		W.R. Grace corporate documents S-4 Registration Statement under SEC Corporate fraudulent conveyance Plaintiff's Brief in Opposition of Defendant's Motion to		8/2/1996	1
				-	
		Dismiss	<u> </u>	1/13/2000	
		W.R. Grace & Co. Annual Report Form 10-K405		0/0/1007	
		NESHAPS documents Consent Decree, privileged documents, press releases		12/23/19	_ 740 000000 004
		Fresenius Medical Care Holdings Inc./NY 10-K405		3/2 do MAU	T 748-000633-001
		Fresenius Medical Care Holdings Inc./NY 8-K		2/1 Budana Archina & Baranda Mana	
		Fresenius Medical Care Holdings Inc./NY 10-K405		3/ <u>1</u> 8/:	
		Sealed Air Corp/Delaware Registration Statement	T	8/:	
		Employee Exposure Summary		6/6/ 1900	1
				-	
748-000634-001	4	Motions / Pleadings / Court Filings/Title Search			
		Libby Asbestos Site Draft Title Search Report by Toeroek Associates; Title Search documents: Sites #1-3, Appendix C Title Trees, Sites #4-5, Sites #1-4, Site #5, Figures Plaintiff's Brief in Opposition of Defendant's Motion to Dismiss for Lack of Personal Jurisdiction and exhibits			748-000634-001
					i Natificial sufmices (10 : 16 Et).

Barcode	Box#	Type of Document	Person(s)	Dat	e Range	
748-000635-001	5	Corporate Documents Colorado/New York/Montana Secretary of State and On-line				
		Certificates of Merger, Agreement and Plan of Merger for Wayne Candies, Inc.; Pearce, Mayer & Greer, Inc.; Pix of America, Inc.; and other companies; Notices, Connecticut Secretary of State documents, Notice of Election or Appointment of Officer/Director		7/: d	WAULT	748-000635-001
		W.R. Grace & Co. and Fresenius National Medical Care Holding, Inc. Forms 8-K, 10-K's, 10-Q's, Proxy Statements, Annual Reports, Independent Auditors' Consent Lincoln County District Court Defendant's Brief in Support of Motion to Dismiss for Lack of				
		Personal Jurisdiction		4/2	26/1999	
		New York Secretary of State Application to do business in New York, Tax Commission certifications, Certificate of Merger, Certificates of Change and Amendment of Application of Authority, Certificate of Incorporation, Biennial Statements for W.R. Grace and Fresenius National Medical Care Holdings, Inc.		12/15/19	99 – 3/0/2000	
		Web site: - History, letter to Grace Shareholder, Libby Issues and Answer	<u> </u>		9/1988	
		Articles of Amendment, Articles of Merger, Articles of Organization for Delka Corporation, Certificates of Change of Address, Change of Directors, Massachusetts corporation Annual Report		40/0/4074	40/24/4000	
		Denver Public Library: newspaper economic information on corporations, Montana Department of Environmental Quality Web Page			12/31/1998) 2000	
		W.R. Grace & Co. File Review Summary re Libby Asbestos Timeline of Events		1881	1999	
		KnowX.com, www.prnewswire.com, www.nytimes.com — Business reports on W.R. Grace & Co., Sealed Air Corporation, Fresenius Medical Care Holdings		11/28/200	0 1/16/2001	
		www.fmc-ag.com Business reports, tax background checks on W.R. Grace & Co., Sealed Air Corporation		11/28/200	00 2/9/2001	
		Sealed Air Corporation: General Shareholder Information, news releases, 1998 Annual Report; Abner v. Asbestos Defendants civil proceedings in San Francisco County, California Kootenai Development Company Annual Report			4/27/2001	
		Rootenal Development Company Annual Report	-		2000	\dashv
748-000636-001	6	Notebooks				7
		Finstad v. W.R. Grace and Company Appeal Exhibits				7
		Workers Dead from Asbestos Disease – Exhibit 225				740 000000 004
•		Finstad v. W.R. Grace and Company Transcript of Proceedings		5/3/19	d&WAULT	748-000636-001
		Marcor Remediation, Inc. Health and Safety Plan			Besiness Archives & Records Manageroom	
		Kootenal Development Company Flyway Property Final Removal Action Work Plan		· ·		
		Draft SAP for Remedial Investigation Contaminant Screening Study at Libby OU4	L			INN UNION NOTES LEGIS IN THE METER
- 10 to 10 t		Kootenai Development Company Kootenai Bluff Property Final Removal Action Work Plan	L	7121	112001	

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		Final Site Health and Safety Plan Screening Plant TO #4 prepared for U.S. Department of			7
	,	Transportation		6/20/2000	_}
] .
748-000637-001	7.	Specifications/Plans/Reports			
		Libby Middle School Track Reconstruction Technical Specifications		10/12/2001	
		Draft Libby Middle School Removal Action Work Plan			
		Libby Asbestos Project Stimson Lumber Company Draft Sampling and Analysis Plan		1:0000	7
		Libby High School Track Reconstruction Final Technical Specifications		1 614	748-000637-001
		Final Screening Plant Removal Action Plan		E dod AULI	746-000037-001
		Final Work Plan Kootenai Bluff		Services Archives & Rocards Management	by And Bell out the State & All.
		Export Plant Final Removal Action Plan			
		Revised Proposal Planning and Logistics and Field Office Setup		£	MUNICAL COLOR COMMUNICADO
		Screening Facility Final Removal Action Plan		8/14/2001	1
		OU4 Final Sampling and Analysis Plan - Contaminant Screening Study		4/0/2002	1
		Records of Deviation/Request for Modification		4/4/2002	1
		March 2000 Sampling Effort		3/0/2000	7 .
		Sample Results for Topsoil, Kalispell, Montana		5/15/2001	
		Final Report RES 75788 1 and 2 CDM Federal Programs Libby		7/18/2001	7
		Health and Safety Plan Form – Residential and Service Sampling		12/7/1999	7 .
		Libby High School Equipment Replacement Summary Report		12/10/2001	1
		Site Visit Report by MWH		2/26/2002	1
		Project Work Plan Siefke and Browlee Properties		10/0/2001	1
		Project Work Plan Siefke and Browlee Properties Addendum #1		10/0/2001	·
		Work Plan Phase I Assessment Libby		12/0/1999	1
		Health and Safety Plan - Inventory and Cleanup		7/0/2001	
		Health and Safety Plan (former Railroad Loading Facility)		4/0/2001	1
		Project Work Plan Inventory and Cleanup		7/0/2001	
748-000638-001		B 24 15.1314			-
748-000b38-001		Depositions and Exhibits		9/34/3003	·
		Deposition and exhibits of Julie Yang			• •
		Documents related to Julie Yang's depo		d®VAULT	748-000638-001
		Deposition and exhibits of Charles Young			
		Documents sent to EPA to attach to Elizabeth Anderson's Report		9/30	4 131 50 4: Aletta 19 11:
		Documents sent to EPA to attach to William Hughson's Report			
				1 403 424 (140) 434 404 404 64	YER-BENG Andergon to be

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748-000639-001	9	Corporate Documents	T		
		B03 Lincoln County corporate documents, deeds		12	
		CO1 EPA - Purchase and Sale Contract with Kootenai Development Company, corporate		THUANS!	748-000639-001
		documents		10/17/19!	,
		CO2 Zonolite corporate documents		3/1963 APPENDATED	NETROEPHOR DE DISTENCIA DE
		CO4 W.R. Grace & Co. Annual Reports		197	
		CO5 Delaware – Secretary of State corporate documents		3/31/199	•
		CO6 Connecticut - Secretary of State corporate documents		5/31/1929 9/15/1969	
748-000640-001	10	Expert Report/Pleadings			·
		Fredric L. Quivik, Ph.D. Expert Report			ı
		Defendant's Response to U.S.'s Motion for Partial Summary Judgment on Costs and on	1	GREAT 7	48-000640-001
Į.		Defendant's Second Affirmative Defense	1 1	do MAUL!	46-000640-001
		Plaintiff's Brief in Opposition to Defendant's Motion to Dismiss for Lack of Personal	 	I MALIAN FIR ALTER DEL	REMITTED A SE
		Findings of Fact and Conclusions of Law re Motions of the Debtors and Asbestos Property			
		Damage Committee to Exclude Evidence	1 . 1	* *** *** *** **** **** **** **** **** ****	G. IN ASSESSED A. CA. CH.
(4)					4
748-000641-001	11	Corporate Reports/Agreements/Bankruptcy Brief/Title Search			
		Corporate Officers and Directors of W.R. Grace and Company and Associated Entities			
		prepared by Toeroek Associates		9/6/2001	•
		Interim Corporate Report A B03 Lincoln County Clerk and Recorder deeds to Kootenai			
		Development Company	<u> </u>	11/3(
İ		Interim Corporate Report B - B03 Lincoln County Clerk and Recorder deeds to Kootenai	1	QVALLET 7	48-000642-001
<u>'</u>		Development Company	L	11/30 documents	10 0000 12 00 .
]		Interim Corporate Report A C01 EPA Plaintiff's Brief in Opposition to Defendant's Motion]	e ala itm a discribit distribit dist	FO COLORES DE COL
		to Dismiss for Lack of Personal Jurisdiction and exhibits			
		Purchase and Sale Contract between W.R. Grace and Company and Kootenai Development	1 1	(determine) beim: Ber mit ann auch aus	93 (6) (10) (11) (7) (1)
		Company	<u> </u>	10/17/1994	
		W.R. Grace and Company's Informational Brief - Chapter 11 in Bankruptcy Court		4/12/2001	
}		Agreement and Plan of Reorganization between W.R. Grace and Company and Zonolite	1		
		Company	<u> </u>	2/21/2001	•
		Libby Asbestos Site Draft Title Search Report by Toeroek Associates	 	2/21/2001	
		Preliminary Findings of W.R. Grace Corporate Structure by Toeroek Associates	1	1/8/2001	

Barcode	Box #	Type of Document	Person(s)	Date Range	
		Interim Corporate Report B C01 EPA Plaintiff's Brief in Opposition to Defendant's Motion			
		to Dismiss for Lack of Personal Jurisdiction and exhibits, Transaction Structure, Purchase	1 1.	•	
		and Sale Contract between W.R. Grace and Company and Kootenai Development Company	1	10/17/1994 1/13/2000	
	İ	Interim Corporate Report A CO2 W.R. Grace and Company 1981 Facilities Audit		2/8/1982	
		Interim Corporate Report B - CO2 W.R. Grace and Company 1981 Facilities Audit		2/8/1982	
		Interim Corporate Report A CO4 www.freeedgar.com Registration Statement, Fresenius Medical Care Holdings Inc./NY 10-K 1995		3/29/1996 3/13/1998	
		Interim Corporate Report A CO4 www.freeedgar.com W.R. Grace and Company 2000 Annual Report		4/16/2001	
		Fresenius Medical Care Holdings Inc./NY 1996 Annual Report		3/31/1997	
		Interim Corporate Report B CO4 www.freeedgar.com W.R. Grace and Company 2000			
		Annual Report		4/16/2001	
		Sealed Air Corp/DE 2000 Annual Report		3/23/2001	
		Fresenius Medical Care Holdings Inc./NY 2000 Annual Report		4/2/2001	
		W.R. Grace and Company 2000 Annual Report		4/16/2001	
		Interim Corporate Report B – CO4 www.freeedgar.com – W.R. Grace and Company			
	`	Registration Statement		3/13/1998	
		W.R. Grace and Company 1998 Annual Report		3/29/1999	
		Fresenius Medical Care Holdings Inc./NY 1995 Annual Report		3/29/1996	_1
18-000642-001	12	Corporate Interim Reports	<u></u>		748-000641-001
		Corporate Interim Reports		Basiness Archives & Educardo Alistagramoni	
					Maria Maria Maria
18-000643-001	13	Corporate Report/Trial Experts			
		W.R. Grace Draft Interim Corporate Report		•	
		W.R. Grace's Designation of Experts		8/30/2002	
{		W.R. Grace's reports and rebuttal from the following experts: Elizabeth Anderson; EPA's			1
		Response to comment from Elizabeth Anderson; Henry Anderson, R.E. Bartelt, Eric Chatfield,			
		Thomas, Dahl, G. Hughson, D.R. Jensen, Richard Lee, J. Lockey		48 XAULT 7	48-000643-001
		U.S.'s Designation of Experts		Ouniness Archive & Bacards Mataganess	
		U.S.'s report and rebuttal from the following experts: Arnold Brody, James Lockey, Gregory Meeker, Suresh Moolgavkar			
					1

Barcode	Box #	Type of Document	Person(s)	Date Range	
748-000644-001	14	Rebuttal Experts			
		U.S.'s reports and rebuttals from the following experts: James Millette, R.M. Turkewitz, Alan		d8WAULT	748-000644-001
		C. Whitehouse, W.R. Wright, Charles Young	1 1	7/2! Sudiese Archites & Records Management	. , , , , , , , , , , , , , , , , , , ,
		U.S.'s designation of rebuttal experts and rebuttal reports from: H. Anderson, R.J. Lee			MERICHIAN
		Group, Inc., Gregory P. Meeker, James Millette, Rob Turkewitz	1	7/3	
		Oral histories relied upon in Expert Report of Fredric L. Quivik, Ph.D. Folders 1-4		4/26/02 3/22/02	4
748-000645-001	15	Depositions and Exhibits	 		<u>.</u>
		Elizabeth Anderson		9/27/2002	7
		Richard Bartelt		9/24/2002	7
		David Croce		0/27/2002	7
		Stephen Dearwent, Jr.			
		Dannie Middleton		d&WAULT 7	48-000645-001
	_	Jeffrey Lybarger			
		Harry Eschenbach			
		William Hughson			
		William Hurley		0/10/2002	1
		Dale Jensen		9/20/2002	7
		Kathleen Kirkland		9/6/2002	
		Michele Koppelman		9/4/2002]
748-000646-001	16	Depositions and Exhibits			-
		Richard Lee File 2 of 2		7/00/0000	.
		James Lockey			48-000646-001
		John McGuiggin		- devault 7	46-000646-001
		Gregory Meeker		Susions Archives & Rounds Management	Ab the Minera and An
		James Millette			
		Eric Moeller			MITTHERN ET
		Sureh Moolgavkar		9/30/2002	1
		Mark Owens		8/16/2002	7
748-000647-001		Depositions			
		Deposition of Paul Peronard		_	
		Deposition of Fredric Quivik		_ d8MAULT 74	8-000647-001
		Deposition of Lester Skramstad		Business Archives & Records (Assuspence)	
		Deposition of Alan Stringer			

Enforcement Confidential Attorney Work Product

Barcode	Box#	Type of Document	Person(s)	Date Range
		Deposition of Timothy Wall		8/13/2002
]	Deposition of Christopher Weis	T I	9/12/2002
		Deposition of Alan Whitehouse		9/6/2002
		Deposition of Robert Wilkins		6/27/2002
		Deposition of Colette Wilson		9/17/2002
		Deposition of Jack Wolter		9/12/2002
		Deposition of Wiley Wright		9/5/2002

Barcode	Box#	Type of Document	Person(s)	Date Range
748-000648-001	2	Julie Chi-Sun Yang, Ph.D. Depositions and Exhibits		
		17 depositions		12/20/1978 - 7/29/1998



6 Bores

Barcode	Box#	Type of Document	Person(s)	Date Range	
		PRIVILEGED TRIAL PREPARATION		T. —	
748-000649-001	1	W.R. Grace Bankruptcy Privilege Logs		488	VAULT 748-000649-001
		Privilege logs		9/25/2	China & Records Management
					I MODELLA CONSTRUCTO DE LA TREME DE LA CONTRACTOR DE LA C
748-000650-001	2	Trial Preparation			
		Also labeled box 5 which is part of set of 31 boxes. See index for 31 boxes for contents		T T	†
		description.			
				487	EAULT 748-000650-001
748-000651-001	3	Trial Preparation		Boulery Ard	Merit Stands Management
		#11 Demos, Libby PPP1-Stereo-PLM.ppt		9/24/:	MADE BUTTO DE CONTRA DE LA CONTRA DEL CONTRA DE LA CONTRA DEL CONTRA DEL CONTRA DE LA CONTRA DEL CONTRA DE LA CONTRA DE LA CONTRA DE LA CONTRA DEL CONTRA DEL CONTRA DE LA CONTRA DE LA CONTRA DEL CON
		Graphics, graphs, #31 and #106 exhibits		12/9/:	
		James Millette handwritten professional background as it relates to Libby		12/18/2002	sansanan experientable testietts the th
		2 CD's: #12 and #36 Libby exhibits			
		Set 1: 2 of 2 invoices, time sheets		4/2/2000 - 1/2/2002	· ·
		Draft and finalized EPA's Response to Comments Received on the Second Supplement to the			
[Export/Screening Plant Administrative Record		6/24/1905	
		Holly Shook's memo and case law for EPA's Response to comments re Second Supplement to			
		Export/Screening Plant, diskette of Shook memo re answer to W.R. Grace's Interrogatory 31			
· ·				7/25/2002	
		Set 1: 1 of 2-Toeroek Associates timesheets			
		Toeroek Associates correspondence and time sheets		2/7/2000 11/27/2002	2
		Dr. Eric J. Chatfield's Analysis re Vermiculite		9/4/2000	
		Published articles on asbestos in dust		4/9/2002	7
		Case law			
		Julie C. Yang, Ph.D. deposition		8/21/2002	38MAULT 748-000651-001
- 1		Dr. Richard J. Lee deposition		10/17/2000	Society Archives & Records Management
		Handwritten notes for Trial Management Order re exhibits; draft TMO			AND HARPE AND COMBERGE AS ALL HOLD AS
		Plan for Objections, exhibits, Libby database instructions		9/11/2002	
		Correspondence with marginalia between attorneys re exhibits		11/25/2002	.
		Handwritten trial database basics		9/11/2002	
		Print-outs from exhibits database		1976 9/18/2002	
		Cause and effect trial preparation, Defendant's exhibits list, table of comments on certain			
		2002 EPA Revised Scenario Samples		12/10/2002	
		Printed copies of cost effects slides, paper by Dr. Wylie re discriminating amphibole			
		cleavage fragments from asbestos, article re lung tumors and asbestos		6/17/1905	
		Article by Dr. Chatfield re TEM specimens		8/0/1990	7

Barcode	Box#	Type of Document	Person(s)	Date Range
		Case law, EPA definition of hazardous substances under CERCLA		
		Toeroek Associates' Initial Comments on document review		6/1/2001
		Miscellaneous notes re exhibits and voir dire		4/3/1979 11/17/2002
		Draft notes in preparaton of Chatfield deposition		
		Chatfield analysis of TEM asbestos samples		9/25/2002
		Table of Lee deposition exhibits, case law, deposition notes for questioning		
		W.R. Grace memo re higher fiber counts with binder		8/22/1980
		Order re Sealed Air Corporation's motion to extend expert reports deadline		8/21/2002
		Deposition exhibit lists and related documents		5/9/2002 9/20/2002
748-000652-001	4	Reports/Studies/Testimony/Analyses		
	-	Handwritten notes		
		Handwritten notes on Meeker and Millette Expert Reports, etc.		
		Libby Asbestos Site Administrative Record Index, Libby trial database entry sheets Administrative		
		Record documents, Special Collections Index		11/11/2002
		Cost documentation for Remedial Administrative Record		11/19/2002
		Itemized Cost Summary (superceded)		10/1/1999 12/31/01
		Draft memo to EPA from Toeroek Associates re Libby Personnel, handwritten notes		2/5/2001
		EPA Work Performed lists		11/7/2002
		Case law in 9th Circuit re exceptions to the Administrative Record		
		Matt's trial exhibits Kathleen Rest testimony		7/31/2001
		Lee EPA error sheets; Lee List of exemplars of Count Sheets		7/6/2000 – 9/23 do
		Letter from Michael Beard of EPA to Sally Sasnett of EPA re misrepresentation of analytical results		Susheja
		for asbestos in bulk materials		11/3/1992
		USA Today article by Lee re high levels of asbestos in dust are an indicator of the need for cleanup		
				2/12/2002
		Bureau of Mines Health Study on asbestos dust		4/31973 – 4/12/1973
		Health and Safety Report - Asbestos Dust Survey Report		10/19/1971 - 10/21/1971
		Chatfield report: "Asbestos Measurements in Workplaces and Ambient Spaces"		·
		Data Comparison of asbestos fibers		
Ì]	Asbestos Fiber Reentrainment During Dry Vacuuming and Wet Cleaning of Asbestos-contaminated		5/04/004
		Carpet		5/0/1991
		Libby Sample Results Summary Report TEM Asbestos Structure Count		8/13/2002
				8/6/2001
		Phase 1 Quality Assurance Project Plan Environmental Monitoring for Asbestos		1/4/2000
		Phase 2 Quality Assurance Project Plan Environmental Monitoring for Asbestos		3/0/2001



WAULT 748-000652-001



Barcode	Box#	Type of Document	Person(s)	Date Range
	T	W.R. Grace comments on Administrative Record for Export Plant and Screening Plant Removal		
		Actions and WRG letter to EPA		3/24/1983 - 2000
		A study of the Reproducibility of the Micro-Vac Technique by Hatfield, et al.		
		Asbestos in Public and Commercial Buildings by Health Effects Institute		1991
		W.R. Grace memo re controlled drop air sampling on 7/23/1976 and drop test results		8/5/1976
		"A Modeling Approach to Estimate Community Exposures to Airborne Asbestos Concentrations		
		from Reentrained Road Dust" by Kira Lynch		7/31/1995
	1	Resume and expert report by Gregory P. Meeker, "The composition of asbestiform		
		amphiboleresultsanalysis"		7/31/2002
		Comments on Proposed Rulemaking on Measuring and Controlling Asbestos Exposure		6/27/2002
	ļ	Kathleen Rest testimony re Workplace Exposure to Asbestos		7/31/2001
		In USA Today by Lee dust needs cleaning		2/12/2002
		Mel and Lerah Parker letter re tailing material from the roadway is a toxic hazardous material		1/20/2001
		Photocopies of road photos from the Parkers		4/25/0000
		Letter from Benjamin Wake to Public Health Service		9/12/1956
		Christopher Weis/EPA letter to W.R. Grace re methodology for analysis		4/4/0000
		Chris Weis memo to Paul Peronard re residual contamination		5/17/2000
		Memo re tremolite problem from Wood to Brookes, et al.		5/24/1977
		W.R. Grace memo relightweight fertilizer customer fiber exposures		1/27/1978 - 2/15/1978
		Wylie's report, "Discriminating Amphibole cleavage fragments from Asbestos: Rationale and		
		Methodology		11/0/1990
		Julie C. Yang's report, "Characterization and Preparation of Respirable Sized Tremolite Fiber and		
		Vermiculte for Animal Studies		4/8/1976
		Ahn, et al. report, "Microstructures and fiber-formation mechanisms of crocidolite asbestos		1991
		Amandus, et al. report on vermiculite miners and millers exposed to tremolite-actinolite		1987
·		Department of the Interior "Contributions to Economic Geology" papers and reports		1928
		Selected Silicate Minerals and their Asbestiform Varieties by Campbell, et al.		
		Health Effects of Tremolite by Bruce Case		
		Demos of amphiboles		
		Meeker Administrative Report summary fo Libby amphibole mineralogy		7/3/2001
		Veblen's report "Anthophyllite asbestos		1980
		Wylie's report, "The Habit of Asbestiform Amphiboles		
		Phase contrast microscopy		5/20/1977
		Yang's report, "Characterization"		4/8/1976
		Deposition Notes: handwritten		
		Drafts of EPA Response to W.R. Grace Comments re Supplement to Export/Screening Plant		

Barcode	Box#	Type of Document	Person(s)	Date Range
		Miscellaneous notes and pictures, memos		
		Actual distributions		8/22/1980 - 0/0/2002
		Fiber samples		
		·		
748-000653-001	5	Defendant's Exhibits, Cost Recovery Backup		
		Tables of Defendant's Exhibits		11/26/2002
		Exhibit Index for Libby Asbestos Site cost recovery litigation created by Toeroek Associates		11/18/2002
		Tracking list for documents requested per Court Order to provide W.R. Grace with documents by 8/29/2001		
		Letter from DOJ regarding Libby-related documents to be sent to the DOJ		3/15/2002
		List of Affidavits for Libby #2		8/14/2002
		Production lists for Libby #1 and Libby #2	•	2001 - 2/4/2002
		R8 letters		7/26/2001
		HQ letters		7/20/2001
		Montana office letters		7/26/2001
		Miscellaneous letters		7/26/2001
		EPA Production List		
		Miscellaneous documentation, drafts, research		3/16/1981 10/23 7/16/2002
		E-mail and correspondence re mobile lab analysis of TEM grids		7/16/2002
		Handwritten notes and e-mail re cost documentation package and privilege log database		8/0/2001 — 5/20/
		Handwritten note re things to do		
		Concordance information		12/18/2002
		Tasks lists		
		Referral Report from EPA to DOJ re Libby #1		3/21/2001
		Libby #1 Document Coding Sheet and documents		2001
		EPA status update of Administrative Record to Holme, Roberts & Owen		7/24/2001
		Memo re legal research re "imminent and substantial endangerment"		8/9/2002
		Draft letter to W.R. Grace re settlement discussions .		12/10/2002
		EPA memo re "no action" assurances		12/12/1995
		Summary of U.S.'s document production		11/19/2002
		Request for a Removal Action Ceiling Increase at Libby		7/12/2001
•		Approval of Work Plan for W.R. Grace bankruptcy		5/28/2002
		DOJ draft letter re contract costs and recovery		5/30/2002
		E-mail re boxes of Libby documents, expert reports, scanning, CD's, Work Plan, bates labeling process, e-mail re agreements with Toeroek Associates, Administrative Record documents		
				9/10/2002



748-000653-001



Barcode	Box#	Type of Document	Person(s)	Date Range	·
		Affidavit sample, e-mail re privilege logs		9/30/2002	
		Outstanding cost issues			
748-000654-001	6	Articles/Lists of Exposed Individuals/Calendar Schedules			
		"Examination of Vermiculite for the Presence of Asbestos Fibres" by Eric J. Chatfield, et al. of Ontario Research Foundation		10/0/1979	
		Richard J. Lee's article, "Dust and Airborne ConcentrationsIs There a Correlation?"			
		Fowler and Price article, "Some Statistical Principles in Asbestos Measurement and their Application to Dust Sampling and Analysis"			
		Revised Preliminary Draft by Versar, Inc. re Asbestos Exposure Assessment for Attic Vermiculite Insulation		6/28/2001 d8	YAULT 748-000654-001
	[List of exposed individuals and their pertinent information			caso and case are the treatment (see the 11 to 12 of 1.
		Updated exposed individuals and their pertinent information		9/24/2001	
		Updated Sampling List – Libby Asbestos		11/14/2001	1 450 MAP 1 400 MIN BALLES AS BASES AND 1 2 EAC 1 END 1 10 MAP
		Updated Sampling List Libby Asbestos		11/13/2001	
		List of Properties to Be Sampled Category I		8/1/2001	
		Clinton Maynard – action items		12/30/2001 4/10/2001	
		Duc Nguyen schedule		8/13/2001 11/9/2001	
		Paul Peronard – schedule		8/8/2001 11/16/2001	
		Chris Weis schedule		8/8/2001 8/10/2001	
		Updated Listening Summary Libby Asbestos		11/13/2001	

BOX INDEX - Set of 31 Delivered to DocuVault November 2006

Barcode	Box#	Type of Document	Person(s)	Date Range	
748-000655-001	1	Motions / Pleadings / Court Filings			
1.10 00000 001	· · · · · ·	Defendants' Response to United States' First Set of Interrogatories, Requests for Production of	 		
		Documents, & Requests for Admission		1/23/2	
		Defendants' Second Set of Interrogatories & Requests for Production of Documents		3/14/2	EXAULT 748-000655-001
		Defendant Kootenai Development Corporation's Answer re: Statement of the Case, Jurisdiction,		<u> </u>	170-00000-001
1		Venue, and Defendants		6/12/2	Maria Art Bases & Browds Managaran
		Defendant W.R. Grace & CoConn.'s Answer to the Allegations re: Statement of the Case,			
ļ ,		Jurisdiction, Venue, and Defendants		6/12/20	10 H 10 H 10 10 10 10
		Defendants' Third Set of Requests for Production of Documents		7/1/2002	l
		United States' Designation of Rebuttal Expert Nelson H. Shapiro		9/25/2002	7
	,	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			7
		Defendants' Response to United States' Motion for Partial Summary Judgment on Response Costs			-
]		and on Defendants' Second Affirmative Defense; Vol. 1 of 1		10/11/2002	
					7
		United States' Motion for Partial Summary Judgment on Response Costs and on Defendants' Second			
j		Affirmative Defense; Vol. 1 of 3 - Exhibits 1-22; Vol. 2 of 3 - Exhibits 23-30; Vol. 3 of 3 - Exhibits 31-42	·		
			,	10/31/2002	
					- .
		United States' Reply to Defendants' Response to Motion for Partial Summary Judgment on Response			7
1		Costs and Defendants' Second Affirmative Defense	·	11/11/2002	
		Order re: Scope and Standard of Review of United States' Reply to Defendants' Response to Motion			
		for Partial Summary Judgment on Response Costs and Defendants' Second Affirmative Defense	·		
				11/13/2002	
		Defendants' Supplemental Response to United States' Interrogatories		11/15/2002	•
		Order re: Costs Incurred; Prejudgment Interest; Declafatory Judgment on Liability re: Subsequent			
		Response Costs or Damages		12/19/2002	· ·
		Draft Pretrial Order-Statement of the Case			
					•
748-000656-001	2	Motions / Pleadings / Court Filings		[a]	749 000656 004
		Defendants' Revised Proposed Findings of Fact and Conclusions of Law		12/3 dod	VAULT 748-000656-001
		Defendants' Motion for Reconsideration		12/3	tables & Records Management
		Defendants' Revised Genuine Issues of Material Fact Including Fed.R.Civ.Proc. 56(f) Facts			
		Discovered After October 31, 2002 Related to United States' Motion for Partial Summary Judgment on			: 01474199 1984 287 177 779 1121 717 1440 189 1141 1142 29 11
		Defendants' Third Affirmative Defense with Exhibits Vol. 1-11		12/31/2002	
748-000657-001		Expert Reports / Rebuttal Reports			
			Tom Dahl, Wiley Wright, III,	dod	FAULT 748-000657-001
			Charles Young /	Business Arch	hrs & Records Museyment

Barcode	Box#	Type of Document	Person(s)	Date Ra	nge
		Defendants' Rule 26(a)(2) Expert Disclosures with Attached Reports of Elizabeth L. Anderson, Suresh			•
		Moolgavkar, Richard Bartelt, Eric Chatfield, Dale Jensen	Moolgavkar, Richard Bartlet, Eric	1	
			Chatfield, Dale Jensen		
		Wiley Wright, III - Cost Report	Wiley Wright, III].
		Wiley Wright, III - Updated Exhibits & Expert Accounting Report	Wiley Wright, III		
		Charles Young Expert Witness Report & Supporting Documents	Charles Young		
		Defendants' Witness List			
				Ì	
		Exhibit Lists & Related Documents			
		Defendants' Exhibit List; Deposition Exhibit Lists & Related Documents; Exhibit Index for Libby			
		Asbestos Site; Miscellaneous Notes re: Exhibits & Voir Dire Information			l
					ENAULT 748-000658-001
748-000658-001	4	Exhibit List & Related Documents			48MAULT 748-000658-001
		Plaintiffs' (Potential) Exhibits			Buciness Archives & Broards Munaground
		Depositions / Exhibits market a Bry 2 of Calso			
748-000659-001	5	Depositions / Exhibits Market			: #### ### ### ### ### ### ### ### ### ### ### ### ### ### ### ### ### ###
650		Harry becnendatin - Amendment to Deposition; Deposition Exhibits /	Harry Eschenbach	10/48/20	· ·
	•	Julie Yang - Deposition Questions and Supporting Documents; Potential Julie Yang Deposition Exhibit	Julie-Yang		
		Report			· ·
748-000660-001		Depositions / Exhibits - Many Many Many Company	et 1 0064 P	V	
48-000660-001		Depositions Exhibits Julie Yang - Depositions and Exhibits Vol. 1-5; Additional Julie Yang Deposition Documents	DOSBA	NI	•
\ /		Dalle Yang - Depositions and Exhibits Vol.1-5, Additional Julie Yang Deposition Documents	_	•	·
					
48-000661-001	7	Privilege Logs & Related Documents			·
		W.R. Grace Initial Privilege Logs			3 MAULT 748-000661-001
		Bankruptcy Privilege Logs (Toeroek Assoc.); Privilege Logs (Toeroek Assoc.)			COCKER COLLEGE / TO COCCE I COLLEGE
		List of Privilege Log #1 Missing Documents			generate im duete eter biet bet fift i ft. Siri 180 i ft. Si:
		Libby #2 Stamps for Document Review			
					i diteritiin bat atte ber bert ban och et. abit ern is de.
48-000662-001	8	Cost Documentation & Related Documents			
			Contractors; IAG; SAC	11/7/2	 1
···		Direct Labor Charge Support	Toeroek Associates, Inc.	02/01/00 -	—
		Costs (Itemized, Indirect, Regional & HQ Travel)		10/01/99 -	348-000662-001
		Costs (iterrized, indired, regional active fraver)			
		Cost Documents for Remedial AR		11/19/:	Berlangs Archives & Racardo Management
					Berlanys Archives & Bacardo Management
		Cost Documents for Remedial AR		11/19/:	
		Cost Documents for Remedial AR Special Project/All Inclusive Report		11/19/: 10/01/99 -	Berlanys Archives & Bacardo Management
48-000663-001		Cost Documents for Remedial AR Special Project/All Inclusive Report		11/19/: 10/01/99 -	Berlanys Archives & Bacardo Management

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Barcode	Box#	Type of Document	Person(s)	Date Range
		Original CRP Summaries		all time frames
		Regional Payroll		2000-2001
		HQ Payroll; Regional Travel	4	10/01/99 - 06/30/0
				07/01/01 - 12/31/01
		Regional Travel		07/01/01 - 12/31/01
		Regional Travel		07/01/01 - 12/31/01
748-000664-001	40			
740-000004-001	10	Cost Documentation & Related Documents Regional Travel (Duc Nguyen; David Ostrander)		
				48 WAULT 748-000664-001
		Regional Travel (Paul Peronard)	<u></u>	COCKETOE!
		Regional Travel (Douglas Skie; Sam Vance; John Wardell; Chris Weis)		I Bluttin till, Built tint tat tat tat tat tat tat en
		Travel Vouchers (Chris Weis; David Williams; William Yellowtail)		
748-000665-001	11	Cost Documentation & Related Documents		construction of the little of the little of the
740 000000 001	····	HQ Travel (Philip Campagna; Sandra Connors; John Gilbert; Joseph Lafornara; David Mickunas;		
į.		Patricia Smith; Victoria VanRoden)		
	·	Travel (Oscar Tarrago; Maria Teran-Maciver; Glenn Tucker; Pam Tucker; Timothy Walker; Jill Welch;		
		John Wheeler; Sandra Whitehouse; Patrick Young; Danny Yu)		'
		ATSDR Payrolf; Travel Expense Reports (Steve Blackwell; Sharon Campolucci; Caroline Cusack;		884AULT 748-000665-001
į		Steve Dearwent; Dan Holcomb; Myrna Lundy; Jeff Lybarger; Tom Mignone; Chris Poulet; Dan		170-00005-001
		Strausbaugh)		(Clericks bids, an elds the thirt on internation at the
Į.	j	ATSDR Travel Vouchers (Sharon Campolucci; Steve Dearwent; Donna Garland; Dan Holcomb;		
İ		Wendy Kaye; Susan Kess; Michael Levin; Jeff Lybarger; Dan Middleton; Tom Mignone; Susan Muza; Laura Northern; Chris Poulet; Oscar Tarrago)		I DOMINETART OR COLORAGE PER EARLY BIT LLEVE ST.
		ATSDR Cost Recovery Time Sheet & Travel Vouchers; NORC Task Request Report; SRC Vouchers;	·	
		CDC Supply/Service Orders		
		ATSDR Payroll Expense Report/Cost Recovery Time Sheets		
		Expense Reports, Travel Vouchers, Records of Activities, Website Info.; SRC Costs; ATSDR Health		
		Consultation Reports; IAG - EPA & ATSDR; ATSDR Payroll Expenses Reports & Timesheets; SRC	•	
		Task Request	·-····································	
48-000666-001	12	Cost Documentation & Related Documents		
48-000600-001		Work Performed Documents; IAG - ATSDR Funding, Indirect, Timekeeping		- 48WAULT 748-000666-001
		Work Performed Documents - Toeroek Associates, Inc.; TechLaw, Inc.; USGS; ISSI		Deliver Arthur A Court House and
		VOLPE/DOT Progress Reports & Invoices		sations as a model to the Medical Political Marchael De Add
		VOLPE/DOT Progress Reports & Invoices	 	
		Work Performed Documents - Lockheed Martin; URS; IT Corp.		LANDING IN AND PRODUCE OF THE STATE OF THE S
	·	Train a serious secunions secunios maran, orto, ii corp.		
48-000667-001	13	Cost Documentation & Related Documents		
		Cost Package Blowbacks of Images from CP Database		1 48 244ULT 748-000667-001

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Barcode	Box#	Type of Document	Person(s)	Date Rar	nge
		Work Performed Documents - ARC; EMSL; ISSI - Misc. Costs			
		Work Performed Documents - EPA Indirect Rate Info.; POLREPS; Guidance Docs./Annual Allocation; Finance Work Papers			
		CRP - Toeroek Associates, Inc./ Purchase Vouchers & Services; IAG - EPA & DOI (USGS); Navy (ISSI) IAG; DOT/VOLPE IAG; ATSDR IAG		10/01/99 - 06	/30/01
		START - URS / Vouchers, Annual Allocation Report; IT Corp. / Tech. Support & Site Eval.; DynCorp / Purchase Vouchers & Services; Apparatus Sales; ISSI / Costs; LeHigh Univ. / Invoices; Parkers Settlement (03/20/01); SRC / Invoices			
748-000668-001	14	Cost Documentation & Related Documents		····	
		ATSDR / Travel Vouchers, Expense Reports, Time Sheets, IAG EPA & DHHS/ATSDR Payroll Expense Report, Cost Recovery Time Sheet; Lockheed Martin / Vouchers			748-000668-001
		Travel Vouchers, Expense Reports, Time Sheets			Business Archings & Secured Monagement
		ATSDR / Supplements (Expense Reports, Time Sheets, Travel Vouchers)		07/01/01 -	e de la composition de la comp
		ATSDR Supplement		5/28/2	
748-000669-001	15	Cost Documentation & Related Documents			I .
		VOLPE Daily Reports			740 000000 004
		Superfund Indirect Costs Rates			38MAULT 748-000669-001
		Work Performed List / Contractors		07/01/01 - 1.	Benians An hive & Gready Management
748-000670-001	16	Corporate Report & Related Documents			
		Libby Asbestos Site Corporate Report			
		Miscellaneous			740 000070 004
		Libby Asbestos Site Section 107 Referral and Related Documents			8 YAULT 748-000670-001
		DOJ Correspondence	·····		Systems Archives & Bacauda Management
		Kelcey Land - Emails & Notes re: Libby (2 folders)			
· · · · · · · · · · · · · · · · · · ·		Sampling Plan - QAPP Revision 1		02/00	I BUILD FOR HEALD BUILD BUILD BUILD OF ALL
748-000671-001		Miscellaneous			· ·
1		Comments re: EPA's Proposal to Place Libby, Montana on the National Priorities List (2 folders)		4/29/20	**WAULT 748-000671-001
		Action Memo Requesting Ceiling Increase (memo; transmittal; supporting documents)			Berlines Archives & Bezards Management
		·			
748-000672-001		Miscellaneous			FORTH AREA OF MAN DE A DAY A DAY TEACH MIN STEAR HEAVE IN THE TANK THE TANK THE TANK THE TANK THE TANK THE TANK
		Minnesota Com Processors, LLC 104(e) Information Request Response		9/28/2001	t .
·		Supplemental Documents from 10/12 Letter from Lund (Grace) re: 6th 104(e) Information Request		•	EMAULT 748-000672-001
· · · · · · · · · · · · · · · · · · ·		Miscellaneous Documents - Drafts & Research			[100 14-101] / 70-0000/2-001

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Barcode	Box#	Type of Document	Person(s)	Date Ra	ange
				1	
748-000673-001	19	Miscellaneous			
		Correspondence and Exhibits re: EPA Letter to Grace re: Grace Comments on Original AR (2 folders)			
				12/28/20	<u>001</u> • .
		Drafts of EPA Response to Grace Comments re: Supplement to the Export/Screening Plant AR			
	ļ	EPA's Response to Comments re: 2nd Supplement to the Export/Screening Plant AR (research;			- 48MAULT 748-000673-00
		supplemental documents; drafts)			Business Archines & Discords Management
		Attachments to EPA's Response to Comments Received on the 2nd Supplement to the			- I directed from der fete time beef directede en ein dem de en en
į		Export/Screening Plant AR			
	•	Caselaw for EPA Response to Comments re: the 2nd Supplement to the Export/Screening Plant AR			Armine a man an
748-000674-001	20	Miscellaneous		-	
140 000074 001		Libby Supplement #2 - AR Index & Images (CD)		+	
		Libby Export/Screening Plant AR Index & Images (CD 1); Supplemental AR #1 Index & Images (CD 1; ICD 2)		 	
		SDMS Records Index - Export/Screeing Plant AR; Supplemental AR #1; Supplemental AR #2			
		Asbestos - Fiber Related Information (pictures; charts etc.)			
		EPA Issue Tag Entry Sheets for Trial Database			8WAULT 748-000674-001
		Special Collections Index / Public Document Index & Images (CD1; CD2; CD3; CD4)			Serinces Archives & Records Management
		Site Assessment - Final Report re: Vermiculite Removal (Shilo, Manitoba)		4/3	NATIONAL PROCESSOR OF CONTROL
		Case Management Timeline		4/1	
		Hazardous Substance Caselaw			
		Database Initial Comments		6/1/200	1
48-000675-001	21	Miscellaneous - CDs (Libby Asbestos Site)		<u> </u>	
		Export/Screening Plant AR - Index & Images (CD 1 - 1 copy)		B	44400
		AR Supplement #2 - Index & Images (4 copies)		Recorded 02 Recorded	711/02
		AR Supplement #1 - Index & Images (4 copies) AR Supplement #1 - Index & Images (CD 1 - 9 copies; CD 2 - 11 copies)			The same of the sa
		An oupplement #1 - mock & images (OD 1 - 3 copies, OD 2 - 11 copies)	****	Recorder	748-000675-001
		Miscellaneous - CDs - Old Versions (missing action memos)		Ţ	Broloness Archibuge & Riccarde Management
		AR File / Export/Screening Plants		Releaser	The best of the desired and the control of the cont
		Export/Screening Plant AR		Updated	
		Export/Screening Plant - Document Index with Images		12/4/200	1 The second sec
		Export/Screening Plant AR		12/4/200	1
		Export Screening Plant - Document Index		12/4/200	11

Barcode	Box#	Type of Document	Person(s)	Date Range
		Miscellaneous- CDs (Libby Asbestos Site)		
		Invoice Database - Self-Executing (WA 2ESS-99-0018)		3/1/2001
	1	Invoice Database - Compatible w/ Access '97 (WA 2ESS-99-0018)		3/1/2001
		Invoice Database - Compatible w/ Access '00 (WA 2ESS-99-0018)		3/1/2001
		Libby Asbestos Database - Camp Dresser & McKee (V1-121201)		12/12/2001
	T	Libby Version 1 Snapshot - Libby Asbestos DB Snapshot - Camp Dresser & McKee		12/23/2002
	1	Libby Asbestos DB Snapshot - Camp Dresser & McKee		3/15/2002
		Libby Asbestos DB Snapshot - Camp Dresser & McKee		5/6/2002
		Libby 2 Asbestos DB Snapshot - Camp Dresser & McKee		5/6/2002
		Libby 2 Asbestos DB Snapshot - Camp Dresser & McKee		8/5/2002
		Facilities CDs (1 set)		
		Releasable Grace DB CDs (2 sets)		
		Privilege Grace DB CDs (1 set)	•	
		CBI Grace DB CDs (1 set)		
		CBI-Priv DB CDs (1 set)		
		Database CDs - Fac. CBI-Priv; Fac. Releasable; CBI-Priv DB; CBI DB; Release 4 DB		
748-000676-001	22	Miscellaneous - Video Tapes (2 sets) & CD containing site pictures		
		Tape 1: Welcome - Keynote Part 1 & Part 2; Asbestos Related Illness; Long Term Health Care Q & A;		
		Asbestos and Loss; Risk Assessment		
		Tape 2: Cut 1: Smoking Cessation Session; Cut 2: Thursday Evening Keynote Session		
		Tape 3: Cut 1: Living with Asbestos Related Illness Session		
		Tape 4: Cut 1: Living with Asbestos Related Illness Session - Medical Aspects		
		Tape 5: Cut 1: Alternative Stress Management		- 484AULT 748-000676-001
		Tape 6: Cut 1: EPA Site Assessments		Brillers Achina & Seconda Management
		Tape 7: Cut 1: Occupational vs. Non-Occupational Exposure		(Alle Will Will Multiple registres where at an
		Tape 8: Cut 1: Information on Environmental Sampling		
		Tape 9: Cut 1: Asbestos Information for the Homeowner		cornection and articities (222) 120 (121) 141 (141)
		Tape 10: Cut 1: Asbestos & Children		-
		Tape 11: Cut 1: Stress Management Workshop		
		Tape 12: Cut 1: Medical Screening & Testing		
		Tape 13: Cut 1: Progress of Clean-Up Activities; Cut 2: What's Next After the Feds Leave Libby?; Cut		
		3: Conference Wrap-Up		
				
748-000677-001	23	Miscellaneous - VOLPE Supplemental Information copied by On-Site Sourcing		- TAN 000077 004
		1 audio cassette tape		 &&Ault 748-000677-001
		4 3 1/2" disks		Pointer-s factificas & Hecasels Albanygrapus
		17 mini DV (digital video) cassettes		
		28 CDs (according to enclosed transmittal letter, there should be 35 CDs)		<u>l</u>

t # Type of Document 17 VHS tape (same as Box #22) Miscellaneous - MAPS Libby, MT - Version 2 Database ERD / Libby 2 Fibers Fiber Case Notes Loading Facility, Export Plant, Screening Plant Export Site	Person(s)	WAULT	748-000678-001
Miscellaneous - MAPS Libby, MT - Version 2 Database ERD / Libby 2 Fibers Fiber Case Notes Loading Facility, Export Plant, Screening Plant Export Site		ا	1
Libby, MT - Version 2 Database ERD / Libby 2 Fibers Fiber Case Notes Loading Facility, Export Plant, Screening Plant Export Site		ا	1
Libby, MT - Version 2 Database ERD / Libby 2 Fibers Fiber Case Notes Loading Facility, Export Plant, Screening Plant Export Site		d8YAULT	748-000678-001
Fibers Fiber Case Notes Loading Facility, Export Plant, Screening Plant Export Site		BYAULT	748-000678-001
Fiber Case Notes Loading Facility, Export Plant, Screening Plant Export Site			/48-0006/8-001
Loading Facility, Export Plant, Screening Plant Export Site			
Export Site		Delivers of North & Action Co. Management	
		ANADER BRIDIN	
1A Screening Plant		1	. 1
1B Screening Plant - Grid & Sampling Results Overlay		~	
1C Screening with Grid, Results, Excavation Location & Soil Quantity		@N/A111 T	748-000686-001
2A KDC/Owen's Property - So. Of Parker's Property		dodavL	7-10 000000 001
2B KDC/Owen's Property - So. Of Parker's Property		· · · · · · · · · · · · · · · · · · ·	Hott 6. tit to Builds (b. 4)
2C KDC/Owen's Property - So. Of Parker's Property with location EAC			
3A Loading Aerial		. I THE REPORT OF THE PARTY OF	1950 BJ CE BALA DILI HADE HADE LAN BA
38 Loading Facilities with Locations		_	
Figure 1: W.R. Grace Corporate Mergers & Reorganizations		RWAULT	748-000687-001
		Business Auditors & Records Nanagraphent	
(Boxes 25-31 are Matt Cohn's Documents)			(MATA), 16-11 (MATA) (MATA)
Motions / Pleadings / Court Filings (Matt Cohn's Box)		- :40-1011 0-401	
Order		9/6/200	
Certification of Indices of Documents Comprising the Administrative Record (w/ attached indices)			
		9/16/200	2
Defendant's Notice of Deposition of James Millette		9/23/200	2
Declaration of Phillip D. Elbeck	Phillip D. Elbeck	9/25/200	2
Defendants' Statement of Genuine Issues of Material Facts Related to United States' Motion for Pa	artial		
Summary Judgment on Defendants' Third Affirmative Defense		10/31/200	12
Order re: Motion to Reschedule Pretrial Conference Date		11/12/200	2
Order re: Scope and Standard of Review		44/42/200	2
Defendants' Supplemental Response to United States' Interrogatories			
Order re: Discovery and In Limine Motions		döMA	ULT 748-000679-001
Defendants' Revised Supplemental Response to United States' Interrogatories		Business Archbyr & Byo	ands Management
Final Pretrial Order		i iii	ANTIN DE HISTORIAN TYPEL DE LIKATE A GE
Defendants' Notice of Deposition of Paul Peronard			
United States' Submission of Proposed Findings of Fact and Conclusions of Law			
United States' Notice of Filing the Proposed Findings of Fact and Conclusions of Law on the			
Administrative Record and Liability and Costs		12/9/2002	2
United States' Proposed Findings of Fact and Conclusions of Law (Liability and Costs)		12/9/2002	2
	1C Screening with Grid, Results, Excavation Location & Soil Quantity 2A KDC/Owen's Property - So. Of Parker's Property 2B KDC/Owen's Property - So. Of Parker's Property 2C KDC/Owen's Property - So. Of Parker's Property with location EAC 3A Loading Aerial 3B Loading Facilities with Locations Figure 1: W.R. Grace Corporate Mergers & Reorganizations (Boxes 25-31 are Matt Cohn's Documents) Motions / Pleadings / Court Filings (Matt Cohn's Box) Order Certification of Indices of Documents Comprising the Administrative Record (w/ attached indices) Defendant's Notice of Deposition of James Millette Declaration of Phillip D. Elbeck Defendants Statement of Genuine Issues of Material Facts Related to United States' Motion for Pasummary Judgment on Defendants' Third Affirmative Defense Order re: Motion to Reschedule Pretrial Conference Date Order re: Scope and Standard of Review Defendants' Supplemental Response to United States' Interrogatories Order re: Discovery and In Limine Motions Defendants' Revised Supplemental Response to United States' Interrogatories Final Pretrial Order Defendants' Notice of Deposition of Paul Peronard United States' Notice of Filing the Proposed Findings of Fact and Conclusions of Law United States' Notice of Filing the Proposed Findings of Fact and Conclusions of Law united States' Notice of Law on the	1B Screening Plant - Grid & Sampling Results Overlay 1C Screening with Grid, Results, Excavation Location & Soil Quantity 2A KDC/Owen's Property - So. Of Parker's Property 2B KDC/Owen's Property - So. Of Parker's Property 2C KOC/Owen's Property - So. Of Parker's Property 2C KOC/Owen's Property - So. Of Parker's Property 3A Loading Aerial 3B Loading Facilities with Locations Figure 1: W.R. Grace Corporate Mergers & Reorganizations (Boxes 25-31 are Matt Cohn's Documents) Motions / Pleadings / Court Filings (Matt Cohn's Box) Order Certification of Indices of Documents Comprising the Administrative Record (w/ attached indices) Defendant's Notice of Deposition of James Millette Declaration of Phillip D. Elbeck Defendants' Statement of Genuine Issues of Material Facts Related to United States' Motion for Partial Summary Judgment on Defendants' Third Affirmative Defense Order re: Motion to Reschedule Pretrial Conference Date Order re: Scope and Standard of Review Defendants' Supplemental Response to United States' Interrogatories Order re: Discovery and In Limine Motions Defendants' Revised Supplemental Response to United States' Interrogatories Final Pretrial Order Defendants' Notice of Deposition of Paul Peronard United States' Submission of Proposed Findings of Fact and Conclusions of Law United States' Notice of Filing the Proposed Findings of Fact and Conclusions of Law On the Administrative Record and Liability and Costs	It S Screening Plant - Grid & Sampling Results Overlay 1c Screening with Grid, Results, Excavation Location & Soil Quantity 2a KDC/Owen's Property - So. Of Parker's Property 2b KDC/Owen's Property - So. Of Parker's Property 2c KCC/Owen's Property - So. Of Parker's Property 2c KCC/Owen's Property - So. Of Parker's Property 2c KCC/Owen's Property - So. Of Parker's Property 2d KCC/Owen's Property - So. Of P

748-000688-001

Barcode	Box#	Type of Document	Person(s)	Date Range
		Proposed Findings of Fact and Conclusions of Law (Administrative Record)		12/9/2002
		Defendants' Notice of Intent to Use CD-Rom Media for Exhibits (W.R. Grace and Kootenai		
		Development)	1	12/9/2002
		Defendants' Notice of Intent to Use Realtime Transcription (W.R. Grace and Kootenai Development)		40,0,000
		Defendants' Submission of Proposed Findings of Fact and Conclusions of Law	-	12/9/2002 12/9/2002
		Defendants' Proposed Findings of Fact and Conclusions of Law	 	12/9/2002
		Order	 	12/19/2002
		Defendants' Notice of Deposition of Chris Weis	· · · · · · · · · · · · · · · · · · ·	12/20/2002
	-	Defendants' Revised Genuine Issues of Material Fact Including Fed.R.Civ.Proc. 56(f) Facts		12/20/2002
	•	Discovered After October 31, 2002 Related to United States' Motion for Partial Summary Judgment on		
		Defendants' Third Affirmative Defense	1	12/31/2002
		Defendants' Motion for Reconsideration		12/31/2002
		Defendants' Revised Proposed Findings of Fact and Conclusions of Law		12/31/2002
		United States' Motion to Exclude the Testimony of Mr. Richard E. Bartelt	Richard E. Bartelt	12/31/2002
		Defendants' Response to United States' Motion for Clarification of December 19, 2002 Order		
				1/2/2003
		Defendants' Response to United States' Supplemental Motion and Brief In Limine to Exclude the		
		Expert Testimony of Dale Jensen		1/2/2003
		Bankruptcy Filings		
		Drafts and Undated Documents		
		Expert Reports / Rebuttal Reports		L
		Eric Chatfield - Expert Report	Eric Chatfield	8/30/2002
		Greg Meeker - Expert Report / Notes	Greg Meeker	
		Dale R. Jensen - Expert Report	Dale R. Jensen	8/30/2002
748-000680-001	26	Expert Reports / Rebuttal Reports (Matt Cohn's Box)		
740-000000-001		Richard J. Lee - Expert Report with Supporting Documents	Richard J. Lee	7/2
	·	Tricinal 9. Coo - Expert report with copporating Decements	Thoraco Coc	
748-000681-001	27	Witness Files & Related Documents (Matt Cohn's Box)		Systems Archive
-			Greg Meeker	
		Defendant's Witness List		
		Plaintiff's Witness List		
		Exhibit Lists & Related Documents		—— Lovi
		Defendant's Exhibits (Lists) & Documents		
		Trial Exhibits		
		Exhibit Information		

748-000680-001



748-000681-001



Barcode	Box#	Type of Document	Person(s)	Date Range
	1	Depositions & Related Documents		
-		Elizabeth Anderson	Elizabeth Anderson	
	T	Eric Chatfield	Eric Chatfield	
		Richard J. Lee	Richard J. Lee	
		Earl D. Lovick	Earl D. Lovick	
		James R. Millette	James R. Millette	
		Paul Peronard	Paul Peronard	
		Chris Weis	Chris Weis	
	T	Julie Yang	Julie Yang	
		Charles Young	Charles Young	
	-	Deposition Notes		
748-000682-001	28	Privilege Logs & Related Documents (Matt Cohn's Box)		
7-10-000002-001		Defendant's Privilege Log & Related Documents		
	 	Plaintiff's Privilege Log	 	748-000682-001
	 	· · · · · · · · · · · · · · · · · · ·	 	884AULT 748-000682-001
	 	Cost Documentation & Related Documents		Bacliness Archives & Records Management
	 	Financial Information for Trial		04/01.
		IT Group Audits	1	O2/OO,
		IAG Progress Report (DOT)		11/19/2002
		RA Project Evaluation Form		2002
748-000683-001	29	Miscellaneous (Matt Cohn's Box)		
		Residential Tracking and Sampling Lists		
		List of Properties to be Sampled		
		Sampling Information		748-000683-001
		Concordance Information		
		Settlement Discussion Documents		Business Archives & Records Makignood
		FOIA Requests		
		Correspondence		- I TO THE RALE HAS BEEN THE STATE OF THE ST
- · · · · · · · · · · · · · · · · · · ·		Notes & Pictures		1
	***	Emails & Reports		
		Caselaw re: Exceptions to the Administrative Record		
748-000684-001	30	Miscellaneous (Matt Cohn's Box)		
		Material from the "Conference on Asbestos and Public Health"		0
		Articles, Reports, Research		108WAULT 748-000684-001
		Phase 2 Sampling and Quality Assurance Project Plan (QAPP)- Revision 0	-	Suplants Architect & Reports Management
		Thase 2 Sampling and Quality Assurance Troject Flor (QALF) Revision 0	I	I MANUAL THE AT HE HAVE A THE SECOND

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Barcode	Box#	Type of Document	Person(s)	Date Range	
		Sampling and Quality Assurance Project Plan (QAPP)- Revision 1			•
		Articles, Reports, Research			
					ľ
748-000685-001	31	Miscellaneous (Matt Cohn's Box)			
,		Comments re: Export/Screening Plant Removal Action Administrative Records & Related Documents		9/28 d8 4/	AULT 748-000685-001
		W.R. Grace Comments re: 05/02/02 Action Memo Amendment and Supplemental AR #2; Supplement			ernelisente anatication fot da do es escribe o a
		to Comments re: Original and Supplemental ARs		<u></u>	
		Administrative Record Index - Export/Screening Plants, Supplement #1, Supplement #2		1	THIN AS NEWS CASTIN THAT I BUT A CASTIN THE STATE SHE CAS
		Documents from Supplemental AR (5 folders)		· · · · · ·	•
	<u> </u>			ļ	
	32-35	Privilege Documents			
	 	Privilege Documents (Libby #1)		ļ	
	36-37	Privilege Documents		 	
		Privilege Documents (Libby #2)			
	38	Privilege Documents		ļ	
		Privilege Documents (Libby #3)		ļ	
	39-95	Produced Documents			

PRIVILEGED AND CONFIDENTIAL

Oil Discharge Exxon Mobil- Yellowstone River spill referred to the Department of Justice (Spill location – Yellowstone County, Montana)

On March 14, 2013, a referral was sent to the Department of Justice (DOJ) for Clean Water Act (CWA) violations related to ExxonMobil's July 1, 2011 discharge of approximately 1,509 barrels (63,378 gallons) of crude oil from its Silvertip Pipeline into the Yellowstone River that runs through the towns of Laurel and Billings, Montana. The Yellowstone River was at flood stage during the spill event causing significant impacts to wildlife (100 animals dead/ 155 oiled, cleaned and released); forcing the temporary closure of drinking water intakes; and impacting approximately 240 miles of river shorelines, floodplains, and riparian areas in varying degrees.

EPA responded to the incident, with On Scene Coordinators overseeing cleanup activities. On July 6, 2011, EPA issued an Administrative Order (AO) to ExxonMobil for cleanup under section 311(c) of the CWA, 33 U.S.C. § 1321(c). Montana issued a Letter of Violation to ExxonMobil on August 17, 2011 and subsequently an Administrative Order on Consent in early 2012, collecting a cash penalty and additional Supplemental Environmental Projects to be determined at a later date.

EPA's referral requests that DOJ file a civil action for penalties against ExxonMobil for discharging crude oil into waters of the United States in violation of section 311(b)(3) of the CWA, 33 U.S.C.§ 1321(b)(3), as amended by the Oil Pollution Act of 1990. Section 311(b)(3) of the CWA is non-delegable, meaning that EPA Region 8 enforces oil spill violations in all Region 8 states and Indian country.

Information only – no action required by the Regional Administrator

Program Contact: Inman.Donnak@epa.gov	303-312-6201
Legal Contact: Morris.brenda@epa.gov	303-312-6891
Darcy O'Connor, TEP Director	303-312-6392
Jennifer Schuller, TEP Supervisor	303-312-6334

	Date Mailed	Label/Addressee/Cert #	CC/DCC IIST	From	Ke:	Date Signed
	8	Richard (Rick) Smith, Owner Ladore Supper Club and Saloon P.O. Box 6044 Sheridan, WY 82802	Peggy Livingston Kathlene Brainich	US EPA; Region 8 Peggy Livingston, Attorney (MC 8ENF-L) 1595 Wynkoop Denver, CO 80202	EPA's Opposition to Motion to Dismiss to Ladore Supper Club	3/8/13
	:	cert # 7009 3410 0000 2592 8444				,
2	3/13/13	Mr. Dammon Frecker Red Desert Reclamation, LLC One Cate Street, Suite 100 Portsmouth, NH 03801 cert # 7009 3410 0000 2592 8444	n/a	US EPA, Region 8 Randy Lamdin (MC 8ENF-RC) 1595 Wynkoop Denver, CO 80202	RCRA with Tom Sitz	3/13/13
	Date Mailed	Label/Addressee/Cert #	cc/bcc list	From		Date Signed
, 4	7	Richard (Rick) Smith, Owner Ladore Supper Club and Saloon P.O. Box 6044 Sheridan, WY 82802 cert # 7009 3410 0000 2592 8451	Peggy Livingston	US EPA, Region 8 Peggy Livingston, Attorney (MC 8ENF-L) 1595 Wynkoop Denver, CO 80202	Request to omit additional copies of docs from prehearing exchange	3/14/13
æ	3/14/13	James F. Holmes, President Liquid Waste Management, Inc. P.O. Box 888 Longmont, CO 80501 cert # 7009 3410 0000 2598 4358	Amy Swanspon	US EPA, Region 8 Amy Swanson, Attorney (MC 8ENF-L) 1595 Wynkoop Denver, CO 80202	opportunity to confer, settlement communication, not admissible subject to federal rule of evidence	3/14/13
	3/14/13	Ignacia S. Moreno, Assistant Attorney General United States Department of Justice Environment and Natural Resources Division P.O. Box 7611 Ben Franklin Station Washington, DC 20044-7611	Mark Pollins, Director Water Enforcement Division United States EPA Headquarters (2201 A) Ariel Rios Building 1200 Pennsylvania Avenue, N.W. Washington, D.C. 20460	Brenda Morris, Attorney (MC 8ENF-L) 1595 Wynkoop Denver, CO 80202	Yellowstone	3/14/13

.

•

	Date Mailed	Label/Addressee/Cert #	cc/bcc list	From	Re:	Date Signed
	3/14/13		Pamela J. Mazakas OECA () United States EPA Headquarters (2241 A) Ariel Rios Building			3/14/13
7			1200 Pennsylvania Avenue, N.W. Washington, D.C. 20460			
			Cynthia Giles	•		<u>ب</u>
	3/14/13		OECA United States EPA Headquarters (2201 A)			3/14/13
			Ariel Rios Building 1200 Pennsylvania Avenue, N.W. Washington, D.C. 20460			
	3/14/13	Brunnelle's Pest Control P.O. Box 1304 Wolfpoint, MT 59201 cert # 7009 3410 0000 2592 0585	n/a	Brenda Morris, Attorney (MC 8ENF-L) 1595 Wynkoop Denver, CO 80202	Resend Penalty Complaint & Notice of Opportunity for Hearing	
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S. COLEMAN – ATTORNEY WORK PRODUCT – DO NOT RELEASE

Direct Exam of Patrice K. (DRAFT)

Background

Name

Testified before in Federal Court? On what issues?

Current Employment/Title

- EPA - Director of the Fiscal Management and Planning Program within the Office of Technical Management Services

How many years have you been in this position?

- Employed with Region 8 for two years in this position, but employed with EPA for twelve years.

Describe employment history with EPA – held other positions?

- Employed with EPA for twelve years.
- Other Positions Held:

Current Responsibilities

- Supervise the Superfund Cost Recovery Team that compiles site-specific costs incurred by EPA in connection with a CERCLA response action into a cost report.

Recognition of Cost Report

Pull up Exhibit xx - Revised Cost Report

Have Patrice look at the Cherokee Site Cost Report

What is Exhibit xx?

- Cost Report generated by EPA for the Cherokee Street Site

How do you recognize it as such?

- The subject line states that it is the full cost package report for the Cherokee Street site and it also lists the site identification number – which is #08SL. I supervised the work of staff that prepared the cost documentation packages and this cost summary report for Cherokee Street, completed a final review of the cost package report, and ultimately approved the cost package report.

What is the date of this cost report for the Cherokee Site?

- February 26, 2003

Is that your signature found next to the "from" caption on the document?

- Yes

Swanson, Amy

To:

Meredith, Sienna

Subject: Attachments: Lambert Opportunity to Confer Letter 130314.Lambert.opptoconfer.fin.docx

Hi. Please take a look and make any changes you deem appropriate to the attached Lambert opportunity to confer letter. I'm pressed on time today to discuss Crow and Lame Deer, but am open Monday between 9:30 and 11:00 am. Can I call you then? Thank you,

Amy Swanson, Senior Attorney Legal Enforcement Program (8ENF-L) U.S. EPA Region 8 1595 Wynkoop Street Denver, CO 80202-1129 Phone: (303) 312-6906

Barcode	D-11 #	Type of Document	Daman(a)	Date Range	
Barcode	DOX#	Type of Document	Person(s)	Date Kange	
748-000622-001	4	Pleadings and Exhibits in re Civil Action No. 01-72-M-DWM			
746-000022-001		Exhibits for U.S.'s Motion for Partial Summary Judgment on Response Costs and on Defendants' Second		 48YAULT 748-000622-0	Δ1
·		Affirmative Defense (Volumes 1 and 3 / Exhibits 1 – 22, 31 – 42)	•	Strakest Architery & Spende Management	O I
		U.S.'s Motion for Partial Summary Judgment on Defendant's Third Affirmative Defense and Exhibits 1 18			
		U.S.'s Motion for Partial Summary Judgment on the Liability of W.R. Grace & CoConn. And on W.R. Grace & CoConn.'s First and Fourth Affirmative Defenses; Statement of Uncontroverted Facts, Brief in Support, Exhibit List, Volume 1 of 3: Exhibits (1 22)			
		Exhibits for Second Affirmative Defense (Volume 3 of 3, Exhibits 31 – 42)			
		U.S.'s Motion for Partial Summary Judgment on Defendant's Third Affirmative Defense, Brief in Support, Statement of Uncontroverted Facts, Exhibit List, Exhibits 1 – 18		10/11/2002	
		Exhibits for U.S.'s Motion for Partial Summary Judgment on the Liability of W.R. Grace & CoConn. And on W.R. Grace & CoConn.'s First and Fourth Affirmative Defenses			
		U.S.'s Motion in Limine to Strike Portion of the Proposed Testimony of Dr. Richard J. Lee, Brief in Support, Proposed Order, Exhibit List, Exhibits 1 10		10/11/2002	
		HRO letter enclosing W.R. Grace & Co. privilege logs, Defendants' Response to U.S.'s Motion in Limine to Strike Portions of the proposed testimony of Dr. Richard J. Lee, Exhibits A, B, 1 – 35, Defendants' Response to U.S.'s Motion in Limine to exclude the Expert Report and Testimony of Dale Jensen, Exhibits 1 – 14		10/31/2002	
			:		
748-000623-001	2	Documents for Civil Action No. 01-72-M-DWM			
,		Privilege log			
		Final draft of ISO International Standard for ambient air determination of numerical concentration of inorganic fibrous particles scanning electron microscopy method		384AULT 748-000623-0	01
		R.J. Lee Group ISO data compiled from EPA Excel Spreadsheets		Business Archives & Exception Adjungtiment	
		R.J. Lee Group Report: Analysis of January 2000 indoor and outdoor air samples			
		U.S. Motion for Partial Summary Judgment on Response Costs and on Defendants' Second Affirmative			
		Defense (Volumes 1 – 3 / Exhibits 1 – 42)		11/2/2002	
748-000624-001	3	Pleadings for Various Actions/Reports/Correspondence/Deposition			
		Superfund reports/documents		6/0/1:	
		Asbestos and health documents		38MAULT 748-000624-00	01
		Fiber contamination of Vermiculites re Libby #1 ~ environmental research		Besides & Record Management	<i>J</i> 1
		Libby #1 - Radiology Survey by Sebastien, et al., Cohort study of mortality		A TABLE FOR THE DESIGNATION OF THE PARTY OF	
		Libby #2: Pleural effects			
		Exposure to Crocidolite and Mesothelioma		Urui 1990	

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Barcode '	Box # Type of Document	Person(s)	Date Range
	Exposure to Tremolite and Respiratory Cancer in New Calc	Ionia: A Case Control Study	0/0/2000
	Progression of pleural and parenchymal disease		0/0/1997
	Vermiculite Producers and Users		9/0/1988
	X-ray evidence of increased asbestos exposure		0/0/2000
	Internal fax re causality		8/12/2002
	Internal fax re FOIA request in re CDC, NIOSH and ATSDR		8/22/2002
	Consolidated Arvin cases: CV-F-92-5068 OWW, CV-F-96- Findings of Fact and Conclusions of Law	6226 OWW, and CV-F-96-6228 OWW	5/24/2002
	CV-91-4098 EPA's Allocation Methodology re Non-site Spe	cific Costs	10/15/1993
	No. 4:97 CV 1557 CDP Memorandum and Order		9/15/1999
	CV F 92-5373 Memorandum Opinionto Enforce Consent	Decree	1/12/2000
	W.R. Grace Interests		6/10/2002
	EPA's Response to 12/21/2002 Comments from W.R. Grac Plant AR	e re the Supplement to the Export/Screening	0.10/2002
	W.R. Grace's Comments		12/21/2001
	Attorney-Client Privileged Response to W.R. Grace's Comm	nents received 7/31/2002	8/11/2002
	W.R. Grace miscellaneous correspondence		4/14/1969 7/15/1985
	Superfund Audit Report Phase 2 Sampling		5/15/2001
,	Memo re Milwaukee Plant and MonoKote		8/1/1973
-	U.S.'s Response to Defendants' Briefto reopen AR		10/22/2002
	Civil Action No. 01-72-M-DWM HRO's request for progress	report re costs	10/17/2002
	U.S.'s Motion and Brief Requesting Leave to File Additional Replies	Factual Materials in Summary Judgment	11/12/2002
	U.S.'s Reply to Defendants' Response to Motion for Partial Defendants' Second Affirmative Defense, attachments and		11/11/2002
	Memos, testimony, report		3/13/2000 - 6/2/2002
	Deposition of Arnold R. Brody		9/30/2002
	Tremolite report, HRO and DOJ correspondence re Civil Ac		4/2/1985 10/11/2002
	W.R. Grace's Motion to Reschedule Pretrial Conference Date	le and supporting Brief	10/24/2002
	Memos, articles on asbestos		0/0/1993 10/1/2002
	Unsigned U.S.'s Unopposed Motion and Brief of the U.S. to	withdraw certain claims with prejudice	0/0/2002
	Summary Report of particulate found after destruction of the	World Trade Center	10/12/2001
	Health-based Soil Investigation Levels Australia		5/24/2002
	Civil Action No. 01-72-M-DWM (D. Mont.) Defendants' Reply re Order to Require EPA to Reopen the AR and exhibits		10/31/2002
	U.S.'s Motion in Limine to Exclude the Expert Report and Te and Proposed Order+B25	stimony of Dale Jensen and exhibits and Brief	10/11/2002

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Barcode	Box#	Type of Document	Person(s)	Date Range
		Documents in re Civil Action No. CV-00-167-M-DWM and Civil Action No. 4-88-822 and		
748-000625-001	4	(ł
		Chapter 11, Case No. 01-01139(JKF) Civil Action No. CV-00-167-M-DWM		
	·	Notice		2/2/2024
		Defendants' Prediscovery Disclosure Statement		2/8/2001
		Order		11/7/2000
				3/9/2001
		U.S. Preliminary Pretrial Statement and draft thereof		
		Joint Discovery Plan	·····	
		Defendants' Motion to Transfer Venue to the District of Delaware		7/17/2001
		U.S.'s Unopposed Motion and Brief for Extension of Time to Respond to Defendants' Motion and Proposed Order		7/27/2001
		W.R. Grace's Preliminary Pretrial Statement		8/29/2001
		Order		9/6/2001
		Defendants' Unopposed Motion for Conducting Preliminary Pretrial Conference by Telephone		10/4/2001
	···	Proposed Order		10/0/2001
		Signed Order	 	10/5/2001
		Notice of Lodging, Consent Decree		10/23/2001
		Signed Order re oral argument		12/5/2000
		Signed Order re telephonic status conference		10/15/2001
		Oral Argument - Transcript of Proceedings between EPA and W.R. Grace		12/20/2000
		Bankruptcy case documents in re Chapter 11, Case No. 01-01139(JKF)		5/10/2002
		Bankruptcy case documents in re Chapter 11, Case No. 01-01139 and Case No. 01-01200		
		Western Minerals Site - map and sampling data (Rec of Comm)		3/27/2002
		Toeroek Analysis of W.R. Grace's Response to EPA's 6th 104(e) Information Request		9/5/2001
		Measurement of Asbestos Air Pollution Inside Buildings Sprayed with Asbestos		8/0/1980 7/9/2001
		Bureau of Mines report, "Selected Silicate Minerals and their Asbestiform Varieties" by Campbell, et al.		
		Expanding Plants information		6/14/1961 - 7/19/2000
		ASTM International - 2002 Johnson Conference: A Review of Asbestos Monitoring Methods and Results		
		for the New York World Trade Center, etc.		7/21/2002 7/25/2002
		Raintree NurseryMel and Lerah Parker and family-miscellaneous letters, pictures, information		3/0/2000 - 4/28/2001
,		<u>Civil Action No. 4-88-822</u> Access Case Harris Jorgensen and Isabel Jorgensen v. Carey-Canada, Inc., et al. documents	,	
		Fibers for Mark Raney		9/23/2002

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Barcode	Box # Type of Document	Person(s)	Date Range
	Libby timeline		4/19/2002
	Summary of Agency Risk Issues for Libby, Montana		2/7/2002
	Superfund Program Management		2/0/1995
	CERCLA original copies		

Barcode	Box#	Type of Document	Person(s)	Date Range	
		MATT'S MISCELLANEOUS BOXES			
748-000626-001		Concordance slay at Toerock			Stor of
, 10 00020 001		Adapter, Concordance Dataflight software, Concordance Information Retrieval System handbook, related manuals and guides			To exper
748-000627-001	2	Toeroek's CD's - stay at Townsk		L EVALUT	748-000627-001
627		CD's of extra copies of Libby Site file		Bordona Archives & Basseda Management	7-10-000027-001
748-000628-001	3	Duplicates from Libby Asbestos File Review			
		W.R. Grace's Comments to EPA's 3rd Action Memo with exhibits and attachments			
748-000629-001	4	Deposition and Notes/Reports/Analyses/Operating Procedures		<u>L</u>	•
		Deposition of Lee			
	· · ·	Lee Preliminary Report			748-000629-001
		Standard Operating Procedures, core samples, soil samples, air samples, Silica analyses, SAED studies, deposition notes for Rich Lee, C. Weis and Meeker, analyses of air samples, Lee's Expert Report, ISO		Bentures Archives & Necessity Assurance	le dirkat for an landan skar
		EDS reports, AHERA EDS reports, airborne asbestos methods, Asbestos Investigation grids, OSHA			
		health effects and other files, RJLG-NVLAP, Lee CV and Publication List		7/18/1977 — 9/11/2002	
748-000630-001	5	Loose Documents		+	740 000000 004
		Document database, briefs, reports, analyses, grids, letter re status of AR, test reports and results, memos, log of WRG's privileged documents		dowal Author & Brown Management	748-000630-001

Barcode	Box#	Type of Document	Person(s)	Date Range	٦
					7
not	Note- book	United States' Designation of Experts: Arnold R. Brody, Ph.D., James E. Lockey, M.D., MS, Gregory P. Meeker, James R. Millette, Ph.D., Fredric L. Quivik, Ph.D., Alan C. Whitehouse, M.D., Wiley Wright III, CPA, Charles Young		7/31/2002	
710 00001 001			 		_]
748-000631-001	1	Finstad v. W.R. Grace and Company			
		Employee Exposure Summaries		3/ d8MAULT	748-000631-001
		Finstad v. W.R. Grace and Company Transcript of Proceedings		Burilians Archines & Becomb Management	
		Finstad v. W.R. Grace and Company Appeal Exhibits Volumes I and II			
		Finstad v. W.R. Grace and Company Transcript of Proceedings	+	5/6/199	
748-000632-001	2	Employee Exposure Summaries	 		٦.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
		Employee Exposure Summaries		3/	748-000632-001
				dodrauli	740-000032-001
748-000633-001		Corporate Documents		Business Archives & Records Minigeneral	164 644 1101 016 10 110 110 110 110 14
		W.R. Grace corporate documents Plaintiff's Brief in Opposition of Defendant's Motion to			
		Dismiss and exhibits	1 [9/	HRENT HATER IN HIGH HIGH AT
		W.R. Grace corporate documents S-4 Registration Statement under SEC Corporate fraudulent conveyance Plaintiff's Brief in Opposition of Defendant's Motion to		8/2/1996	1
		Dismiss		1/13/2000	· .
		W.R. Grace & Co. Annual Report Form 10-K405		0/0/1007	1
		NESHAPS documents Consent Decree, privileged documents, press releases		12/23/19	740 000000 004
		Fresenius Medical Care Holdings Inc./NY 10-K405		3/2 dodAULT	748-000633-001
		Fresenius Medical Care Holdings Inc./NY 8-K		2/4 Statem Archive & Second Management	,
		Fresenius Medical Care Holdings Inc./NY 10-K405		3/1 8/:	
		Sealed Air Corp/Delaware Registration Statement		8/: WWW.	
		Employee Exposure Summary		6/6/ 1 9 00	1
748-000634-001	4	Motions / Pleadings / Court Filings/Title Search			
		Libby Asbestos Site Draft Title Search Report by Toeroek Associates; Title Search]		740 000004 004
1		documents: Sites #1-3, Appendix C Title Trees, Sites #4-5, Sites #1-4, Site #5, Figures		d8WAULT	748-000634-001
		Plaintiff's Brief in Opposition of Defendant's Motion to Dismiss for Lack of Personal	1 1	Suplanes Archives & Secondo Albangement	
1		Jurisdiction and exhibits			
			 		MWANTHIN ##
				, <u>,</u>	

Barcode	Box#	Type of Document	Person(s)	Date Range	
748-000635-001	5	Corporate Documents Colorado/New York/Montana Secretary of State and On-line			
		Certificates of Merger, Agreement and Plan of Merger for Wayne Candies, Inc.; Pearce, Mayer & Greer, Inc.; Pix of America, Inc.; and other companies; Notices, Connecticut Secretary of State documents, Notice of Election or Appointment of Officer/Director		7/3 d8WAULT	748-000635-001
		W.R. Grace & Co. and Fresenius National Medical Care Holding, Inc. Forms 8-K, 10-K's, 10-Q's, Proxy Statements, Annual Reports, Independent Auditors' Consent Lincoln County District Court Defendant's Brief in Support of Motion to Dismiss for Lack of		Rysiness Archive & Records Management	
		Personal Jurisdiction	1 1	4/26/1999	
		New York Secretary of State Application to do business in New York, Tax Commission certifications, Certificate of Merger, Certificates of Change and Amendment of Application of Authority, Certificate of Incorporation, Biennial Statements for W.R. Grace and Fresenius National Medical Care Holdings, Inc.		12/15/1999 3/0/2000	
		Web site: History, letter to Grace Shareholder, Libby Issues and Answer	 	4/9/1988	 ,
		Articles of Amendment, Articles of Merger, Articles of Organization for Delka Corporation, Certificates of Change of Address, Change of Directors, Massachusetts corporation Annual		,	
		Report	<u> </u>	12/9/1974 12/31/1998	
		Denver Public Library: newspaper economic information on corporations, Montana	1 1	4000 0000	
		Department of Environmental Quality Web Page W.R. Grace & Co. File Review Summary re Libby Asbestos Timeline of Events		1960 2000 1881 1999	
		KnowX.com, www.prnewswire.com, www.nytimes.com Business reports on W.R. Grace &	 	1001 1999	-
ļ		Co., Sealed Air Corporation, Fresenius Medical Care Holdings	, ,	11/28/2000 1/16/2001	
		www.fmc-ag.com Business reports, tax background checks on W.R. Grace & Co., Sealed Air Corporation		11/28/2000 2/9/2001	
		Sealed Air Corporation: General Shareholder Information, news releases, 1998 Annual Report; Abner v. Asbestos Defendants civil proceedings in San Francisco County, California		1998 4/27/2001	
		Kootenai Development Company Annual Report	1	2000	
745 000000 004					
748-000636-001	- 6	Notebooks Finstad v. W.R. Grace and Company Appeal Exhibits	 		
		Workers Dead from Asbestos Disease Exhibit 225			•
		Finstad v. W.R. Grace and Company Transcript of Proceedings	 	5/3/11 d8 YAULT	748-000636-001
		Marcor Remediation, Inc. Health and Safety Plan	-	Swinces Archives & Records Management	2 10 000000 00 1
		Kootenai Development Company Flyway Property – Final Removal Action Work Plan		and the second	
		Draft SAP for Remedial Investigation Contaminant Screening Study at Libby OU4			
		Kootenai Development Company Kootenai Bluff Property Final Removal Action Work Plan		712112001	1

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Barcode	Box#	Type of Document	Person(s)	Date Range	
		Final Site Health and Safety Plan Screening Plant TO #4 prepared for U.S. Department of			7
		Transportation		6/20/2000	
748-000637-001	7	Specifications/Plans/Reports			_
		Libby Middle School Track Reconstruction Technical Specifications		10/12/2001	
		Draft Libby Middle School Removal Action Work Plan			
		Libby Asbestos Project Stimson Lumber Company Draft Sampling and Analysis Plan		1:0000	7
		Libby High School Track Reconstruction - Final Technical Specifications		1 01/4	748-000637-001
		Final Screening Plant Removal Action Plan		Edocati	7-46-000037-001
		Final Work Plan Kootenai Bluff .		escuritati duticit	a that left ou the the 110. A. 41
		Export Plant Final Removal Action Plan		Ε	
	: .	Revised Proposal Planning and Logistics and Field Office Setup		E HIMELER STREET	HILLER B. SCORI APP REVISION AND MAIL
ı.		Screening Facility Final Removal Action Plan		8/14/2001	
		OU4 Final Sampling and Analysis Plan Contaminant Screening Study		4/0/2002	
		Records of Deviation/Request for Modification		4/4/2002	
		March 2000 Sampling Effort		3/0/2000]
		Sample Results for Topsoil, Kalispell, Montana		5/15/2001	1
		Final Report RES 75788 1 and 2 CDM Federal Programs Libby		7/18/2001	7
		Health and Safety Plan Form Residential and Service Sampling		12/7/1999	1
		Libby High School – Equipment Replacement Summary Report	Ī	/ 12/10/2001	1
		Site Visit Report by MWH	1	2/26/2002	
		Project Work Plan – Siefke and Browlee Properties		10/0/2001	1
		Project Work Plan Siefke and Browlee Properties Addendum #1		10/0/2001	·
		Work Plan Phase I Assessment Libby		12/0/1999	1
		Health and Safety Plan Inventory and Cleanup		7/0/2001	
		Health and Safety Plan (former Railroad Loading Facility)		4/0/2001	1
		Project Work Plan Inventory and Cleanup		7/0/2001	
748-000638-001	8	Depositions and Exhibits			
40-000b36-001		Deposition and exhibits of Julie Yang		0/24/2002	
		Documents related to Julie Yang's depo			
		Deposition and exhibits of Charles Young	···	dayault	748-000638-001
		Documents sent to EPA to attach to Elizabeth Anderson's Report		9/3(States a Store Management	
		Documents sent to EPA to attach to William Hughson's Report			
	 	Doddinents sont to El 11 to attach to William Flughson's Neport			

Barcode	Box#	Type of Document	Person(s)	Date Range	
748-000639-001	9	Corporate Documents			7
		B03 Lincoln County corporate documents, deeds		12	
		CO1 EPA - Purchase and Sale Contract with Kootenai Development Company, corporate		d8VAULT	748-000639-001
		documents	 	10/17/19! Authors Authors & Basseds Mainagement	
		CO2 Zonolite corporate documents		3/1963 ARTHURATE	પ્રદાશભાષા કાલ્યાના લ
		CO4 W.R. Grace & Co. Annual Reports		197	
		CO5 Delaware – Secretary of State corporate documents		3/31/199	
		CO6 Connecticut Secretary of State corporate documents		5/31/1929 — 9/15/1969	-
748-000640-001	10	Expert Report/Pleadings			
		Fredric L. Quivik, Ph.D. Expert Report			4
		Defendant's Response to U.S.'s Motion for Partial Summary Judgment on Costs and on			748-000640-001
i		Defendant's Second Affirmative Defense	i i	dö ya uli	746-000640-001
	<u> </u>	Plaintiff's Brief in Opposition to Defendant's Motion to Dismiss for Lack of Personal		I AND ONLY AND AND AND AND AND AND AND AND AND AND	ORDICIONIL DE DE
		Findings of Fact and Conclusions of Law re Motions of the Debtors and Asbestos Property			
/		Damage Committee to Exclude Evidence		1 mac 1 ma m m m m m m m m m m m m m m m m m	Griffillisia 4. ft
1.42			i ————————————————————————————————————		1
748-000641-001	11	Corporate Reports/Agreements/Bankruptcy Brief/Title Search			1
		Corporate Officers and Directors of W.R. Grace and Company and Associated Entities]		1
<u></u> 1		prepared by Toeroek Associates	<u> </u>	9/6/2001	
		Interim Corporate Report A B03 Lincoln County Clerk and Recorder deeds to Kootenai			
		Development Company		11/31	
		Interim Corporate Report B - B03 Lincoln County Clerk and Recorder deeds to Kootenai		11/31 d8VAULT 7	748-000642-001
		Development Company		11/31 doctato	10 0000 12 00 1
		Interim Corporate Report A C01 EPA Plaintiff's Brief in Opposition to Defendant's Motion		# Ada (EM 6 M)	160 (1): (1): (1): (1) (1)
		to Dismiss for Lack of Personal Jurisdiction and exhibits			
		Purchase and Sale Contract between W.R. Grace and Company and Kootenai Development			· ·
		Company		10/17/1994	
		W.R. Grace and Company's Informational Brief – Chapter 11 in Bankruptcy Court		4/12/2001	
Ì		Agreement and Plan of Reorganization between W.R. Grace and Company and Zonolite			
		Company		2/21/2001	
	<u></u>	Libby Asbestos Site Draft Title Search Report by Toeroek Associates		2/21/2001	
		Preliminary Findings of W.R. Grace Corporate Structure by Toeroek Associates		1/8/2001	•

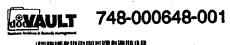
Barcode	Box#	Type of Document	Person(s)	Date Range	
	T	Interim Corporate Report B C01 EPA Plaintiff's Brief in Opposition to Defendant's Motion			
ļ .	[to Dismiss for Lack of Personal Jurisdiction and exhibits, Transaction Structure, Purchase]		· ·
	1	and Sale Contract between W.R. Grace and Company and Kootenai Development Company		10/17/1994 1/13/2000	
	1	Interim Corporate Report A - CO2 W.R. Grace and Company 1981 Facilities Audit		2/8/1982	
		Interim Corporate Report B CO2 W.R. Grace and Company 1981 Facilities Audit		· 2/8/1982	7
		Interim Corporate Report A CO4 www.freeedgar.com Registration Statement, Fresenius			
		Medical Care Holdings Inc./NY 10-K 1995		3/29/1996 3/13/1998	j
	İ	Interim Corporate Report A CO4 www.freeedgar.com W.R. Grace and Company 2000			
		Annual Report		4/16/2001	
		Fresenius Medical Care Holdings Inc./NY 1996 Annual Report		3/31/1997	
		Interim Corporate Report B CO4 www.freeedgar.com - W.R. Grace and Company 2000	1 1	•	ì
		Annual Report		4/16/2001	
		Sealed Air Corp/DE 2000 Annual Report		3/23/2001	
		Fresenius Medical Care Holdings Inc./NY 2000 Annual Report		4/2/2001	
		W.R. Grace and Company 2000 Annual Report	1	4/16/2001	
		Interim Corporate Report B - CO4 www.freeedgar.com - W.R. Grace and Company			
		Registration Statement		3/13/1998	
		W.R. Grace and Company 1998 Annual Report		3/29/1999	
	· · · · · ·	Fresenius Medical Care Holdings Inc./NY 1995 Annual Report		3/29/1996	1
			1		
748-000642-001	12	Corporate Interim Reports			48-000641-001
		Corporate Interim Reports		Business Archives & Racards Management	
710 000010 001					
748-000643-001	13	Corporate Report/Trial Experts			
		W.R. Grace Draft Interim Corporate Report		0/00/0000	⊣
		W.R. Grace's Designation of Experts		8/30/2002	-1 .
		W.R. Grace's reports and rebuttal from the following experts: Elizabeth Anderson; EPA's]		1
		Response to comment from Elizabeth Anderson, Henry Anderson, R.E. Bartelt, Eric Chatfield,	i		
		Thomas, Dahl, G. Hughson, D.R. Jensen, Richard Lee, J. Lockey			48-000643-001
		U.S.'s Designation of Experts		Business Archives & Records Management	
		U.S.'s report and rebuttal from the following experts: Arnold Brody, James Lockey, Gregory			
		Meeker, Suresh Moolgavkar			Marin Hint si
					1

Barcode	Box#	Type of Document	Person(s)	Date Range	
748-000644-001	14	Rebuttal Experts			
		U.S.'s reports and rebuttals from the following experts: James Millette, R.M. Turkewitz, Alan	 	de Yault	748-000644-001
		C. Whitehouse, W.R. Wright, Charles Young		7/2! Surless Archives & Bocards Management	
		U.S.'s designation of rebuttal experts and rebuttal reports from: H. Anderson, R.J. Lee		: ####################################	
		Group, Inc., Gregory P. Meeker, James Millette, Rob Turkewitz	1 1	7/3	
		Oral histories relied upon in Expert Report of Fredric L. Quivik, Ph.D. Folders 1-4		4/26102 3122102	
748-000645-001	15	Depositions and Exhibits	 		
		Elizabeth Anderson	†	9/27/2002	
		Richard Bartelt	1	9/24/2002	
		David Croce	†**********	9/27/2002	
		Stephen Dearwent, Jr.	 		
		Dannie Middleton	1		8-000645-001
		Jeffrey Lybarger		Business Archives & Records Management	
		Harry Eschenbach		PARAMETER PROPERTY OF THE PROP	ieliā ir il
		William Hughson			
		William Hurley		0/10/2002	
		Dale Jensen		9/20/2002	
		Kathleen Kirkland		9/6/2002	
		Michele Koppelman		9/4/2002	
748-000646-001	16	Depositions and Exhibits	 		
		Richard Lee File 2 of 2		7/00/0000	
		James Lockey			0 000040 004
		John McGuiggin		- d8WAULT 74	8-000646-001
		Gregory Meeker		Pusheys Archives & Records Management	
		James Millette			IRII 44
		Eric Moeller		A BETWEEN CHANGE AND DESCRIPTION OF THE AND D	HBME#1
		Sureh Moolgavkar		9/30/2002	
		Mark Owens		8/16/2002	
48-000647-001	17	Depositions			
		Deposition of Paul Peronard			
		Deposition of Fredric Quivik		_ devault 748	-000647-001
		Deposition of Lester Skramstad		Desires Archives & Becards Hamagement	
		Deposition of Alan Stringer			MAR
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	Deposition of Timothy Wall		8/13/2002
	Deposition of Christopher Weis		9/12/2002
	Deposition of Alan Whitehouse		9/6/2002
	Deposition of Robert Wilkins	,	6/27/2002
	Deposition of Colette Wilson		9/17/2002
	Deposition of Jack Wolter		9/12/2002
	Deposition of Wiley Wright		9/5/2002

Barcode	Box#	Type of Document	Person(s)	Date Range
748-000648-001	2	Julie Chi-Sun Yang, Ph.D. Depositions and Exhibits	,	
		17 depositions		12/20/1978 - 7/29/1998



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		PRIVILEGED TRIAL PREPARATION			
748-000649-001	1	W.R. Grace Bankruptcy Privilege Logs		d8	VAULT 748-000649-001
		Privilege logs		9/25/2	rhites & Records Alensgonere
					AMERICAN ANALAS DEL ROCKE de Recine de As
748-000650-001	2	Trial Preparation			
		Also labeled box 5 which is part of set of 31 boxes. See index for 31 boxes for contents			4
		description.	:		
				/d8)	VAULT 748-000650-001
748-000651-001	3	Trial Preparation		Anshes A	Obert & Reside Manager
		#11 Demos, Libby PPP1-Stereo-PLM.ppt		9/24/:	in the communication of the same
		Graphics, graphs, #31 and #106 exhibits		12/9/:	
		James Millette handwritten professional background as it relates to Libby		12/18/2002	
		2 CD's: #12 and #36 Libby exhibits			
		Set 1: 2 of 2 invoices, time sheets		4/2/2000 1/2/2002	
		Draft and finalized EPA's Response to Comments Received on the Second Supplement to the			
		Export/Screening Plant Administrative Record		6/24/1905	<u> </u>
		Holly Shook's memo and case law for EPA's Response to comments re Second Supplement to			
		Export/Screening Plant, diskette of Shook memo re answer to W.R. Grace's Interrogatory 31			
				7/25/2002	
		Set 1: 1 of 2-Toeroek Associates timesheets			
		Toeroek Associates correspondence and time sheets		2/7/2000 11/27/200	2
		Dr. Eric J. Chatfield's Analysis re Vermiculite		9/4/2000	
		Published articles on asbestos in dust		4/9/2002	
		Case law			
		Julie C. Yang, Ph.D. deposition		8/21/2002	8WAULT 748-000651-001
·		Dr. Richard J. Lee deposition		10/17/2000	Business Architecs & Records Management
		Handwritten notes for Trial Management Order re exhibits; draft TMO			
		Plan for Objections, exhibits, Libby database instructions		9/11/2002	BASTATA MARIAN BASTATA MARIAN MARIAN MARIAN MARIAN MARIAN MARIAN MARIAN MARIAN MARIAN
		Correspondence with marginalia between attorneys re exhibits	*	11/25/2002	_
		Handwritten trial database basics		9/11/2002	
		Print-outs from exhibits database		1976 9/18/2002	
I		Cause and effect trial preparation, Defendant's exhibits list, table of comments on certain	•	·	
		2002 EPA Revised Scenario Samples		12/10/2002	
		Printed copies of cost effects slides, paper by Dr. Wylie re discriminating amphibole			
		cleavage fragments from asbestos, article re lung tumors and asbestos		6/17/1905	
I		Article by Dr. Chatfield re TEM specimens		8/0/1990	•

Barcode	Box#	Type of Document	Person(s)	Date Range
[Case law, EPA definition of hazardous substances under CERCLA		
		Toeroek Associates' Initial Comments on document review		6/1/2001
		Miscellaneous notes re exhibits and voir dire		4/3/1979 11/17/2002
		Draft notes in preparaton of Chatfield deposition		
		Chatfield analysis of TEM asbestos samples		9/25/2002
_		Table of Lee deposition exhibits, case law, deposition notes for questioning		
		W.R. Grace memo re higher fiber counts with binder		8/22/1980
		Order re Sealed Air Corporation's motion to extend expert reports deadline		8/21/2002
		Deposition exhibit lists and related documents		5/9/2002 - 9/20/2002
748-000652-001	4	Reports/Studies/Testimony/Analyses		
		Handwritten notes		
		Handwritten notes on Meeker and Millette Expert Reports, etc.	·	
		Libby Asbestos Site Administrative Record Index, Libby trial database entry sheets Administrative Record documents, Special Collections Index		11/11/2002
		Cost documentation for Remedial Administrative Record		11/19/2002
		Itemized Cost Summary (superceded)		10/1/1999 12/31/01
		Draft memo to EPA from Toeroek Associates re Libby Personnel, handwritten notes		2/5/2001
		EPA Work Performed lists		11/7/2002
		Case law in 9th Circuit re exceptions to the Administrative Record		1.77,2002
		Matt's trial exhibits - Kathleen Rest testimony		7/31/2001
		Lee EPA error sheets; Lee List of exemplars of Count Sheets		7/6/2000 — 9/23 d8
		Letter from Michael Beard of EPA to Sally Sasnett of EPA re misrepresentation of analytical results for asbestos in bulk materials		11/3/1992
		USA Today article by Lee re high levels of asbestos in dust are an indicator of the need for cleanup		1110/1992
			·	2/12/2002
		Bureau of Mines Health Study on asbestos dust		4/31973 4/12/1973
		Health and Safety Report Asbestos Dust Survey Report		10/19/1971 - 10/21/1971
		Chatfield report: "Asbestos Measurements in Workplaces and Ambient Spaces"		
		Data Comparison of asbestos fibers		
		Asbestos Fiber Reentrainment During Dry Vacuuming and Wet Cleaning of Asbestos-contaminated		
		Carpet		5/0/1991
		Libby Sample Results Summary Report		8/13/2002
		TEM Asbestos Structure Count		8/6/2001
		Phase 1 Quality Assurance Project Plan - Environmental Monitoring for Asbestos		1/4/2000
		Phase 2 Quality Assurance Project Plan Environmental Monitoring for Asbestos		3/0/2001



WAULT 748-000652-001



Barcode	Box#	Type of Document	Person(s)	Date Range
•		W.R. Grace comments on Administrative Record for Export Plant and Screening Plant Removal		
		Actions and WRG letter to EPA		3/24/1983 - 2000
_		A study of the Reproducibility of the Micro-Vac Technique by Hatfield, et al.		
		Asbestos in Public and Commercial Buildings by Health Effects Institute		1991
		W.R. Grace memo re controlled drop air sampling on 7/23/1976 and drop test results		8/5/1976
		"A Modeling Approach to Estimate Community Exposures to Airborne Asbestos Concentrations		
		from Reentrained Road Dust* by Kira Lynch		7/31/1995
		Resume and expert report by Gregory P. Meeker, "The composition of asbestiform		
		amphiboleresultsanalysis*		7/31/2002
		Comments on Proposed Rulemaking on Measuring and Controlling Asbestos Exposure		6/27/2002
		Kathleen Rest testimony re Workplace Exposure to Asbestos		7/31/2001
		In USA Today by Lee – dust needs cleaning		2/12/2002
		Mel and Lerah Parker letter re tailing material from the roadway is a toxic hazardous material		1/20/2001
		Photocopies of road photos from the Parkers		4/25/0000
		Letter from Benjamin Wake to Public Health Service		9/12/1956
		Christopher Weis/EPA letter to W.R. Grace re methodology for analysis		4/4/0000
		Chris Weis memo to Paul Peronard re residual contamination		5/17/2000
` .		Memo re tremolite problem from Wood to Brookes, et al.	•	5/24/1977
-		W.R. Grace memo relightweight fertilizer customer fiber exposures		1/27/1978 - 2/15/1978
		Wylie's report, "Discriminating Amphibole cleavage fragments from Asbestos: Rationale and	······································	
	<u> </u>	Methodology		11/0/1990
		Julie C. Yang's report, "Characterization and Preparation of Respirable Sized Tremolite Fiber and		
		Vermiculte for Animal Studies		4/8/1976
		Ahn, et al. report, "Microstructures and fiber-formation mechanisms of crocidolite asbestos		1991
	4	Amandus, et al. report on vermiculite miners and millers exposed to tremolite-actinolite		1987
		Department of the Interior "Contributions to Economic Geology" papers and reports		1928
		Selected Silicate Minerals and their Asbestiform Varieties by Campbell, et al.		
		Health Effects of Tremolite by Bruce Case		
		Demos of amphiboles		
		Meeker Administrative Report summary fo Libby amphibole mineralogy		7/3/2001
		Veblen's report "Anthophyllite asbestos		1980
		Wylie's report, "The Habit of Asbestiform Amphiboles	•	
		Phase contrast microscopy		5/20/1977
		Yang's report, "Characterization"		4/8/1976
		Deposition Notes: handwritten		
		Drafts of EPA Response to W.R. Grace Comments re Supplement to Export/Screening Plant		

Barcode	Box#	Type of Document	Person(s)	Date Range
		Miscellaneous notes and pictures, memos		
		Actual distributions		8/22/1980 - 0/0/2002
		Fiber samples		
748-000653-001	5	Defendant's Exhibits, Cost Recovery Backup		
		Tables of Defendant's Exhibits		11/26/2002
· · · · · · · · · · · · · · · · · · ·		Exhibit Index for Libby Asbestos Site cost recovery litigation created by Toeroek Associates		11/18/2002
		Tracking list for documents requested per Court Order to provide W.R. Grace with documents by 8/29/2001		
		Letter from DOJ regarding Libby-related documents to be sent to the DOJ		3/15/2002
		List of Affidavits for Libby #2		8/14/2002
		Production lists for Libby #1 and Libby #2		2001 2/4/2002
		R8 letters		7/26/2001
		HQ letters		7/20/2001
		Montana office letters		7/26/2001
		Miscellaneous letters		7/26/2001
		EPA Production List		
		Miscellaneous documentation, drafts, research		3/16/1981 10/23 7/16/2002
		E-mail and correspondence re mobile lab analysis of TEM grids		7/16/2002
		Handwritten notes and e-mail re cost documentation package and privilege log database		8/0/2001 5/20/
		Handwritten note re things to do		
	,	Concordance information		12/18/2002
		Tasks lists		
		Referral Report from EPA to DOJ re Libby #1		3/21/2001
		Libby #1 Document Coding Sheet and documents		2001
		EPA status update of Administrative Record to Holme, Roberts & Owen		7/24/2001
		Memo re legal research re "imminent and substantial endangerment"		8/9/2002
		Draft letter to W.R. Grace re settlement discussions		12/10/2002
		EPA memo re "no action" assurances		12/12/1995
		Summary of U.S.'s document production		11/19/2002
		Request for a Removal Action Ceiling Increase at Libby		7/12/2001
	*	Approval of Work Plan for W.R. Grace bankruptcy		5/28/2002
		DOJ draft letter re contract costs and recovery		5/30/2002
		E-mail re boxes of Libby documents, expert reports, scanning, CD's, Work Plan, bates labeling process, e-mail re agreements with Toeroek Associates, Administrative Record documents	·	
				9/10/2002



748-000653-001



Barcode	Box#	Type of Document	Person(s)	Date Range		
		Affidavit sample, e-mail re privilege logs		9/30/2002		
		Outstanding cost issues				
748-000654-001	6	Articles/Lists of Exposed Individuals/Calendar Schedules				
		"Examination of Vermiculite for the Presence of Asbestos Fibres" by Eric J. Chatfield, et al. of Ontario Research Foundation		10/0/1979		
		Richard J. Lee's article, "Dust and Airborne ConcentrationsIs There a Correlation?"				
		Fowler and Price article, "Some Statistical Principles in Asbestos Measurement and their Application to Dust Sampling and Analysis"				
		Revised Preliminary Draft by Versar, Inc. re Asbestos Exposure Assessment for Attic Vermiculite Insulation			TAUAK	748
		List of exposed individuals and their pertinent information			•	mangaste
		Updated exposed individuals and their pertinent information		9/24/2001		
		Updated Sampling List Libby Asbestos		11/14/2001	1 AEST MEA D. CES COM DO 2: 40 d.	ttsi ista a ista ista
		Updated Sampling List – Libby Asbestos		11/13/2001		
		List of Properties to Be Sampled - Category I		8/1/2001		
		Clinton Maynard – action items		12/30/2001 4/10/200	1	
		Duc Nguyen schedule		8/13/2001 - 11/9/2001		
		Paul Peronard schedule		8/8/2001 - 11/16/2001	ī <u>"</u>	
		Chris Weis schedule		8/8/2001 8/10/2001	7	
		Updated Listening Summary Libby Asbestos		11/13/2001		

8-000654-001



Barcode	Box#	Type of Document	Person(s)	Date Rang	ge ·
748-000655-001	1	Motions / Pleadings / Court Filings	<u> </u>		
]	Defendants' Response to United States' First Set of Interrogatories, Requests for Production of			
L		Documents, & Requests for Admission		1/23/2	
		Defendants' Second Set of Interrogatories & Requests for Production of Documents		3/14/2	8MAULT 748-000655-001
		Defendant Kootenai Development Corporation's Answer re: Statement of the Case, Jurisdiction,		T	UOCEANO E IN TO COOK SERVICE
		Venue, and Defendants		6/12/2	1400,46, 2 M. 6224-45,/1146-4 letter 15-114, /4 44
		Defendant W.R. Grace & CoConn.'s Answer to the Allegations re: Statement of the Case,			
1	1	Jurisdiction, Venue, and Defendants		6/12/20	A THE THE WATER THE PROPERTY OF THE PARTY OF
		Defendants' Third Set of Requests for Production of Documents		7/1/2002	1
		United States' Designation of Rebuttal Expert Nelson H. Shapiro		9/25/2002	
					
		Defendants' Response to United States' Motion for Partial Summary Judgment on Response Costs	 		
1	l	and on Defendants' Second Affirmative Defense; Vol. 1 of 1	,	10/11/2002	,
				10/11/2002	`
		United States' Motion for Partial Summary Judgment on Response Costs and on Defendants' Second		 	
		Affirmative Defense; Vol. 1 of 3 - Exhibits 1-22; Vol. 2 of 3 - Exhibits 23-30; Vol. 3 of 3 - Exhibits 31-42	1		
[TAINTIALITY DEGREEO, VOI. 1 OF 0 - EXHIBITS 1-22, VOI. 2 OF 0 - EXHIBITS 20-00, VOI. 3 OF 2 - EXHIBITS 31-42		10/31/2002	,
<u> </u>				10/31/2002	`
	<u> </u>	United States' Reply to Defendants' Response to Motion for Partial Summary Judgment on Response			
		Costs and Defendants' Second Affirmative Defense	İ	11/11/2002	,
		Order re: Scope and Standard of Review of United States' Reply to Defendants' Response to Motion		1111112002	·
		for Partial Summary Judgment on Response Costs and Defendants' Second Affirmative Defense	Ì		·
		l a line continuely diagricult on recopositio deals and policinality diagriculty diagriculty		11/13/2002	
		Defendants' Supplemental Response to United States' Interrogatories		11/15/2002	
		Order re: Costs Incurred; Prejudgment Interest; Declaratory Judgment on Liability re: Subsequent		11/13/2002	
		Response Costs or Damages		12/19/2002	
		Draft Pretrial Order-Statement of the Case		12/19/2002	——·
		Drait Freihal Order-Statement of the Case		<u> </u>	 ∤
740 000000 004				a	
748-000656-001	2	Motions / Pleadings / Court Filings		I.	8YAULT 748-000656-001
		Defendants' Revised Proposed Findings of Fact and Conclusions of Law		12/3· [d	TO COCCO CO I
		Defendants' Motion for Reconsideration		12/3	(Alberta bille du têu têu êmi bil du ber e têu bêu
		Defendants' Revised Genuine Issues of Material Fact Including Fed.R.Civ.Proc. 56(f) Facts			
		Discovered After October 31, 2002 Related to United States' Motion for Partial Summary Judgment on	·		: NACE NAME ON THE ADMENT OF REPORT OF THE STATE OF THE S
		Defendants' Third Affirmative Defense with Exhibits Vol. 1-11		12/31/2002	 .
748-000657-001		Event Beneda / Behattel Beneda	<u> </u>	 	i
140-000001-001		Expert Reports / Rebuttal Reports	To a Combi Millou Millou	f	WALLE 740 000657 004
			Tom Dahl, Wiley Wright, III, Charles Young	[di	EXAULT 748-000657-001
		<u> </u>	Chanes roung	Busine	us Archives & Becards Mussgroven

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Barcode	Box#	Type of Document	Person(s)	Date Rai	nge	
	I	Defendants' Rule 26(a)(2) Expert Disclosures with Attached Reports of Elizabeth L. Anderson, Suresh				
	ļ	Moolgavkar, Richard Bartell, Eric Chatfield, Dale Jensen	Moolgavkar, Richard Bartlet, Eric	1	1	
			Chatfield, Dale Jensen		•	
		Wiley Wright, III - Cost Report	Wiley Wright, III			
		Wiley Wright, III - Updated Exhibits & Expert Accounting Report	Wiley Wright, III			
		Charles Young Expert Witness Report & Supporting Documents	Charles Young			
		Defendants' Witness List				
		Exhibit Lists & Related Documents				
		Defendants' Exhibit List; Deposition Exhibit Lists & Related Documents; Exhibit Index for Libby				
		Asbestos Site; Miscellaneous Notes re: Exhibits & Voir Dire Information			ł	
						740 000050 001
748-000658-001	4	Exhibit List & Related Documents	ļ <u>-</u>		d8WAULT	748-000658-001
		Plaintiffs' (Potential) Exhibits			Sucions Archiers & Broards Management	
		1 And talso				
748-000659-001	5	Depositions / Exhibits Market 1917				11 14 14 14 14 14 14 14
650		Harry Bechenbach - Amendment to Deposition; Deposition Exhibits	Harry Eschenback	10/18/20	<u></u>	
	'	Julie Yang - Deposition Questions and Supporting Documents; Potential Julie Yang Deposition Exhibit	Julie-Yang	_	l	
		Report				
		Denositions Dayhibits - Musiku And Market	14000			
748-000660-001	6	Depositions / Exhibits	DATBN	XIII		
\ /		Julie Yang - Depositions and Exhibits Vol 1-5; Additional Julie Yang Deposition Documents		•		
\sim				<u></u>		
***					i	
48-000661-001		Privilege Logs & Related Documents	<u> </u>			740 000064 004
		W.R. Grace Initial Privilege Logs			d SYAULT	748-000661-001
		Bankruptcy Privilege Logs (Toeroek Assoc.); Privilege Logs (Toeroek Assoc.)			Budares Archives & Bezondo Management	
		List of Privilege Log #1 Missing Documents				mikalineli
		Libby #2 Stamps for Document Review				
40 000000 004		0.40.			· · · · · · · · · · · · · · · · · · ·	
48-000662-001		Cost Documentation & Related Documents EPA Work Performed Lists	Contractor IAC: CAC	44770000		
		Direct Labor Charge Support	Contractors; IAG; SAC Toeroek Associates, Inc.	11/7/2	~	
		Costs (Itemized, Indirect, Regional & HQ Travel)	Toeroek Associates, inc.	02/01/00 -	BYAULT	748-000662-001
		Cost Documents for Remedial AR		10/01/99 -	Section Asian & Brown Management	, , , , , , , , , , , , , , , , , , , ,
		Special Project/All Inclusive Report		11/19/:	i de lesta de de de de la fist	नाम स्थाप्ति से स
		Special Project/All Inclusive Report		10/01/99 -		
		All Inclusive Cont Deport				
		All Inclusive Cost Report		10/01/99 -	(017113 R: F.M: 0 01 162 465 410 1	A TO A TO COLOR OF A CO.
48 000663 004				10/01/99 -	\$ \\ 4.17.18.18.18.18.18.18.18.18.18.18.18.18.18.	ATO O DE UNITER AL
48-000663-001	9	All Inclusive Cost Report Cost Documentation & Related Documents Itemized Cost Summary		10/01/99 -	1	748-000663-001

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Barcode	Box#	Type of Document	Person(s)	Date Range
		Original CRP Summaries		all time frames
		Regional Payroll		2000-2001
		HQ Payroll; Regional Travel		10/01/99 - 06/30/0
_				07/01/01 - 12/31/01
		Regional Travel	·	07/01/01 - 12/31/01
		Regional Travel		07/01/01 - 12/31/01
				1
748-000664-001	10	Cost Documentation & Related Documents		
	_	Regional Travel (Duc Nguyen; David Ostrander)		740,00004,004
		Regional Travel (Paul Peronard)		
		Regional Travel (Douglas Skie; Sam Vance; John Wardell; Chris Weis)		Business Archives & Browth Management
		Travel Vouchers (Chris Weis; David Williams; William Yellowtail)		
748-000665-001	11	Cost Documentation & Related Documents		 .
		HQ Travel (Philip Campagna; Sandra Connors; John Gilbert; Joseph Lafornara; David Mickunas;		
		Patricia Smith; Victoria VanRoden)		
		Travel (Oscar Tarrago; Maria Teran-Maciver; Glenn Tucker; Pam Tucker; Timothy Walker; Jill Welch;		
		John Wheeler; Sandra Whitehouse; Patrick Young; Danny Yu)		
I		ATSDR Payroll; Travel Expense Reports (Steve Blackwell; Sharon Campolucci; Caroline Cusack;		WAULT 748-000665-001
		Steve Dearwent; Dan Holcomb; Myrna Lundy; Jeff Lybarger; Tom Mignone; Chris Poulet; Dan	•	COCEMENTS / TO-OUOUS-OUT
		Strausbaugh)		(Cânglis lith Cu bie des little at mir ma die des
İ		ATSDR Travel Vouchers (Sharon Campolucci; Steve Dearwent; Donna Gartand; Dan Holcomb;	•	
İ		Wendy Kaye; Susan Kess; Michael Levin; Jeff Lybarger; Dan Middleton; Tom Mignone; Susan Muza; Laura Northern; Chris Poulet; Oscar Tarrago)	•	I DOMENIA CALLINA CALL
		ATSDR Cost Recovery Time Sheet & Travel Vouchers; NORC Task Request Report; SRC Vouchers;		
)		CDC Supply/Service Orders		
		ATSDR Payroll Expense Report/Cost Recovery Time Sheets		
		Expense Reports, Travel Vouchers, Records of Activities, Website Info.; SRC Costs; ATSDR Health	·····	
)		Consultation Reports; IAG - EPA & ATSDR; ATSDR Payroll Expenses Reports & Timesheets; SRC	•	
		Task Request		
48-000666-001	12	Cost Documentation & Related Documents		740,00000,004
		Work Performed Documents; IAG - ATSDR Funding, Indirect, Timekeeping		TANAULT 748-000666-001
		Work Performed Documents - Toeroek Associates, Inc.; TechLaw, Inc.; USGS; ISSI		Businers Archives & Becards Management
		VOLPE/DOT Progress Reports & Invoices		A A A A A A A A A A A A A A A A A A A
		VOLPE/DOT Progress Reports & Invoices		
		Work Performed Documents - Lockheed Martin; URS; IT Corp.		
48-000667-001	13	Cost Documentation & Related Documents		+ '
70-00007-001		Cost Documentation & Related Documents Cost Package Blowbacks of Images from CP Database		8WAULT 748-000667-001
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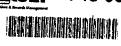
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Barcode	Box#	Type of Document	Person(s)	Date Rar	ige	
		Work Performed Documents - ARC; EMSL; ISSI - Misc. Costs				
		Work Performed Documents - EPA Indirect Rate Info.; POLREPS; Guidance Docs./Annual Allocation;				
		Finance Work Papers		·		
		CRP - Toeroek Associates, Inc./ Purchase Vouchers & Services; IAG - EPA & DOI (USGS); Navy			•	
		(ISSI) IAG; DOT/VOLPE IAG; ATSDR IAG	······	10/01/99 - 06	/30/01	
		START - URS / Vouchers, Annual Allocation Report; IT Corp. / Tech. Support & Site Eval.; DynCorp /				
		Purchase Vouchers & Services; Apparatus Sales; ISSI / Costs; LeHigh Univ. / Invoices; Parkers		1		
		Settlement (03/20/01); SRC / Invoices				
748-000668-001						
740-000000-001	14	Cost Documentation & Related Documents ATSDR / Travel Vouchers, Expense Reports, Time Sheets, IAG EPA & DHHS/ATSDR Payroli			ı	
'		Expense Report, Cost Recovery Time Sheet; Lockheed Martin / Vouchers				748-000668-001
		Travel Vouchers, Expense Reports, Time Sheets	····		TAUAW 86	746-000000-00 I
		ATSDR / Supplements (Expense Reports, Time Sheets, Travel Vouchers)		07/01/01 -	Susiness Archives & Recends Management	
		ATSDR Supplement		5/28/2		
		A TOUR Outplantail		3/20/2	1919 1919 1919 1919 1919 1919 1919 191	
748-000669-001	15	Cost Documentation & Related Documents			1	
7 10 000000 001		VOLPE Daily Reports			, ——	· ·
		Superfund Indirect Costs Rates	*	- 		748-000669-001
		Work Performed List / Contractors		07/01/01 - 1.	Deciment Architect & Eccopits Management	, 10 000000 001
				- CANGLIGA L	: ECO STREETS ON CONTR	eretreren as elevias de si.
748-000670-001	16	Corporate Report & Related Documents				
		Libby Asbestos Site Corporate Report				KEDIĞE IS SINE GITERA DEGITE MA.

		Miscellaneous	····		·	
		Libby Asbestos Site Section 107 Referral and Related Documents	······································		d8WAULT	748-000670-001
		DOJ Correspondence			Sushers Archives & Records Management	
		Kelcey Land - Emails & Notes re: Libby (2 folders)	-		400,000,000,40,000,600	HISBURATE THE NATIONAL PROPERTY OF THE PROPERT
		Sampling Plan - QAPP Revision 1		02/00.		
					1	
748-000671-001	. 17	Miscellaneous				
		Comments re: EPA's Proposal to Place Libby, Montana on the National Priorities List (2 folders)			.01/4	740 000074 004
				4/29/20	48WAULT	748-000671-001
		Action Memo Requesting Ceiling Increase (memo; transmittal; supporting documents)			annocal Archives & Bacardo Management	
748-000672-001		Miscellaneous			: ILLUSTRUM (FILLA)	NET LET SEE LET MEET AL SEE
		Minnesota Corn Processors, LLC 104(e) Information Request Response		9/28/2001	1	
		Supplemental Documents from 10/12 Letter from Lund (Grace) re: 6th 104(e) Information Request				
		Aliandana Danisa da Barata			d8WAULT	748-000672-001
<u></u>		Miscellaneous Documents - Drafts & Research			Bankers Archive & Branch Hammer	· .0 0000/2-001

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Barcode	Box#	Type of Document	Person(s)	Date Range	•
748-000673-001	19	Miscellaneous		·	
		Correspondence and Exhibits re: EPA Letter to Grace re: Grace Comments on Original AR (2 folders)		12/28/2001	
		Drafts of EPA Response to Grace Comments re: Supplement to the Export/Screening Plant AR			
		EPA's Response to Comments re: 2nd Supplement to the Export/Screening Plant AR (research; supplemental documents; drafts)		748-000	673-00°
		Attachments to EPA's Response to Comments Received on the 2nd Supplement to the	· · · · · · · · · · · · · · · · · · ·	A STREET FAIR OF THE PROPERTY	
٠.		Export/Screening Plant AR	•		
	,-	Caselaw for EPA Response to Comments re: the 2nd Supplement to the Export/Screening Plant AR		dender a seem thirth trimes thefile of the	
748-000674-001	20	Miscellaneous			
140 00001 1 001		Libby Supplement #2 - AR Index & Images (CD)			
		Libby Export/Screening Plant AR Index & Images (CD 1); Supplemental AR #1 Index & Images (CD 1; CD 2)			
		SDMS Records Index - Export/Screeing Plant AR; Supplemental AR #1; Supplemental AR #2			
		Asbestos - Fiber Related Information (pictures; charts etc.)			
		EPA Issue Tag Entry Sheets for Trial Database		38MAULT 748-000674	4-001
		Special Collections Index / Public Document Index & Images (CD1; CD2; CD3; CD4)		Backery Archives & Records Management	
		Site Assessment - Final Report re: Vermiculite Removal (Shilo, Manitoba)		4/S STREET RATE OF THE LOCAL OF THE STREET S	
		Case Management Timeline		4/1	
		Hazardous Substance Caselaw			
		Database Initial Comments	•	6/1/2001	
48-000675-001	21	Miscellaneous - CDs (Libby Asbestos Site)			
		Export/Screening Plant AR - Index & Images (CD 1 - 1 copy)		Recorded 02/11/02	
· ·		AR Supplement #2 - Index & Images (4 copies)		Recorded	
		AR Supplement #1 - Index & Images (CD 1 - 9 copies; CD 2 - 11 copies)		Recorder Recorder 740 0000	
		Miscellaneous - CDs - Old Versions (missing action memos)		48 4AULT 748-00067	5-001
		AR File / Export/Screening Plants		Released IIII II DIE IN III II II II II II II II II II II II	
		Export/Screening Plant AR		Releaser Updated	
		Export/Screening Plant - Document Index with Images		12/4/2001	
		Export/Screening Plant AR		12/4/2001	
		Export Screening Plant - Document Index		12/4/2001	
				 	

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Barcode	Box#	Type of Document	Person(s)	Date Range	
		Miscellaneous- CDs (Libby Asbestos Site)			
		Invoice Database - Self-Executing (WA 2ESS-99-0018)		3/1/2001	
		Invoice Database - Compatible w/ Access '97 (WA 2ESS-99-0018)		3/1/2001	
		Invoice Database - Compatible w/ Access '00 (WA 2ESS-99-0018)		3/1/2001	
		Libby Asbestos Database - Camp Dresser & McKee (V1-121201)		12/12/2001	
		Libby Version 1 Snapshot - Libby Asbestos DB Snapshot - Camp Dresser & McKee		12/23/2002	
		Libby Asbestos DB Snapshot - Camp Dresser & McKee		3/15/2002	
		Libby Asbestos DB Snapshot - Camp Dresser & McKee		5/6/2002	
		Libby 2 Asbestos DB Snapshot - Camp Dresser & McKee		5/6/2002	
		Libby 2 Asbestos DB Snapshot - Camp Dresser & McKee		8/5/2002	
		Facilities CDs (1 set)			
		Releasable Grace DB CDs (2 sets)	٥		
		Privilege Grace DB CDs (1 set)	-		
		CBI Grace DB CDs (1 set)			
		CBI-Priv DB CDs (1 set)			•
		Database CDs - Fac. CBI-Priv; Fac. Releasable; CBI-Priv DB; CBI DB; Release 4 DB			
748-000676-001	22	Miscellaneous - Video Tapes (2 sets) & CD containing site pictures			
		Tape 1: Welcome - Keynote Part 1 & Part 2; Asbestos Related Illness; Long Term Health Care Q & A;			
		Asbestos and Loss; Risk Assessment		<u> </u>	
		Tape 2: Cut 1: Smoking Cessation Session; Cut 2: Thursday Evening Keynote Session			
		Tape 3: Cut 1: Living with Asbestos Related Illness Session	-	<u> </u>	
		Tape 4: Cut 1: Living with Asbestos Related Illness Session - Medical Aspects			
		Tape 5: Cut 1: Alternative Stress Management		d8MAULT 748-000676-	.ΛΛ∢
		Tape 6: Cut 1: EPA Site Assessments		Analores Auchines & Records Management	001
		Tape 7: Cut 1: Occupational vs. Non-Occupational Exposure		All the Control of the Martin Control of the	
		Tape 8: Cut 1: Information on Environmental Sampling			
		Tape 9: Cut 1: Asbestos Information for the Homeowner		ा करण स्था असम हासामा । एउस्म १५ मा सि । है ।	
		Tape 10: Cut 1: Asbestos & Children			
		Tape 11: Cut 1: Stress Management Workshop		<u> </u>	
		Tape 12: Cut 1: Medical Screening & Testing			
		Tape 13: Cut 1: Progress of Clean-Up Activities; Cut 2: What's Next After the Feds Leave Libby?; Cut			
		3: Conference Wrap-Up			
48-000677-001	23	Miscellaneous - VOLPE Supplemental Information copied by On-Site Sourcing	· · · · · · · · · · · · · · · · · · ·	 	
70-000011-001		1 audio cassette tape	`		-001
		4 3 1/2" disks	·	Printed Articles & Broads Management	301
		17 mini DV (digital video) cassettes		44 mille 100 du libratio 100 bereio de citado de 40	
		28 CDs (according to enclosed transmittal letter, there should be 35 CDs)	,		

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		LIBBY ASBES			
		BOX INDEX - Set of 31 Delivered to	to DocuVault Nov	8MAULT	748-000688-001
Barcode	Box#	Type of Document	Person(s)	Business Archives & Records Studengermon	
		17 VHS tape (same as Box #22)			
			 		DIA PERANGKAN KATUKATAN KA
748-000678-001	24	Miscellaneous - MAPS	· · · · · · · · · · · · · · · · · · ·	I	1
		Libby, MT - Version 2 Database ERD / Libby 2		·	
		Fibers		SYAULT	748-000678-001
()		Fiber Case Notes		Sucional Archives & Breands Management	
101		Loading Facility, Export Plant, Screening Plant		A A A A A A A A A A A A A A A A A A A	Intralité de ligitari.
48		Export Site			
1		1A Screening Plant	†	1 Harde (II) 4 - 11 - 11 - 11	and burieffly an account of the
17		18 Screening Plant - Grid & Sampling Results Overlay	<u> </u>		
		1C Screening with Grid, Results, Excavation Location & Soil Quantity			748-000686-001
		2A KDC/Owen's Property - So. Of Parker's Property		d8 VAULT	7-0-00000-001
78.		2B KDC/Owen's Property - So. Of Parker's Property		Surinera Archines & Records Management - Abertata 2001 (Dec 18 et 8)	: tri ve. ed ta ltvdt3-rb-H
0 04		2C KDC/Owen's Property - So. Of Parker's Property with location EAC			
1, 1, 1		3A Loading Aerial		1858/50/100/100/100/100	FITTER BUTTER HE G &
1 8 6/		3B Loading Facilities with Locations			
V ()		Figure 1: W.R. Grace Corporate Mergers & Reorganizations		d®MAULT	748-000687-001
V °				Byriness fachion & Bergeds Management	
		(Boxes 25-31 are Matt Cohn's Documents)		man hirl	RECORDER AND AND AND AND AND AND AND AND AND AND
748-000679-001	25	Motions / Pleadings / Court Filings (Matt Cohn's Box)			1
		Order		9/6/200	11
		Certification of Indices of Documents Comprising the Administrative Record (w/ attached indices)			
				9/16/200	02
		Defendant's Notice of Deposition of James Millette		9/23/200	02
		Declaration of Phillip D. Elbeck	Phillip D. Elbeck	9/25/200)2
		Defendants' Statement of Genuine Issues of Material Facts Related to United States' Motion for Partial			
		Summary Judgment on Defendants' Third Affirmative Defense		10/31/20	
		Order re: Motion to Reschedule Pretrial Conference Date		11/12/20	
		Order re: Scope and Standard of Review	- · · · · · · · · · · · · · · · · · · ·	14/42/20	no 1
		Defendants' Supplemental Response to United States' Interrogatories			III 740 000070 004
		Order re: Discovery and In Limine Motions		doll'A	ULT 748-000679-001
· -		Defendants' Revised Supplemental Response to United States' Interrogatories		Posteral Archives & Ba	COME MANAGEMENT
		Final Pretrial Order			
		Defendants' Notice of Deposition of Paul Peronard			HINDER SELECTION (AND TENNIS A ME
		United States' Submission of Proposed Findings of Fact and Conclusions of Law	ļ		
		United States' Notice of Filing the Proposed Findings of Fact and Conclusions of Law on the Administrative Record and Liability and Costs		40/0/000	2
		United States' Proposed Findings of Fact and Conclusions of Law (Liability and Costs)		12/9/200	-
		ornica oraces i roposea i mangs of i act and conclusions of Law (claumity and costs)		12/9/200	4

Barcode	Box#	Type of Document	Person(s)	Date Range
		Proposed Findings of Fact and Conclusions of Law (Administrative Record)		12/9/2002
		Defendants' Notice of Intent to Use CD-Rom Media for Exhibits (W.R. Grace and Kootenai		
<u> </u>		Development)		12/9/2002
	1	Defendants' Notice of Intent to Use Realtime Transcription (W.R. Grace and Kootenai Development)		
	 	Defendants' Submission of Proposed Findings of Fact and Conclusions of Law	<u> </u>	12/9/2002
	+	Defendants' Proposed Findings of Fact and Conclusions of Law		12/9/2002
	+	Order	 	12/19/2002
	 	Defendants' Notice of Deposition of Chris Weis		12/20/2002
	 	Defendants' Revised Genuine Issues of Material Fact Including Fed.R.Civ.Proc. 56(f) Facts		12/20/2002
	1	Discovered After October 31, 2002 Related to United States' Motion for Partial Summary Judgment on	.]	
ı	1	Defendants' Third Affirmative Defense	1	12/31/2002
		Defendants' Motion for Reconsideration		12/31/2002
		Defendants' Revised Proposed Findings of Fact and Conclusions of Law	-	12/31/2002
		United States' Motion to Exclude the Testimony of Mr. Richard E. Bartelt	Richard E. Bartelt	12/31/2002
	1	Defendants' Response to United States' Motion for Clarification of December 19, 2002 Order		
				1/2/2003
	I	Defendants' Response to United States' Supplemental Motion and Brief In Limine to Exclude the		
	1	Expert Testimony of Dale Jensen		1/2/2003
	<u> </u>	Bankruptcy Filings		
	<u> </u>	Drafts and Undated Documents		
	 			
		Expert Reports / Rebuttal Reports	F : 01 15 11	
	ļ	Eric Chatfield - Expert Report	Eric Chatfield	8/30/2002
	 	Greg Meeker - Expert Report / Notes	Greg Meeker	
	ļ. —	Dale R. Jensen - Expert Report	Dale R. Jensen	8/30/2002
748-000680-001	26	Expert Reports / Rebuttal Reports (Matt Cohn's Box)		
			Richard J. Lee	7/2
		The late of 200 Expert trapet with supporting programs	1401010 0. 200	
748-000681-001	27	Witness Files & Related Documents (Matt Cohn's Box)		Burbrus Arthres
		Greg Meeker	Greg Meeker	
		Defendant's Witness List		
		Plaintiff's Witness List		
		Exhibit Lists & Related Documents		- Cour
		Defendant's Exhibits (Lists) & Documents		dod
		Trial Exhibits	****	Builness Archive &
		Exhibit Information		<u> </u>
	<u> </u>			<u> </u>

748-000680-001





748-000681-001



Barcode	Box#	Type of Document	Person(s)	Date Range .
		Depositions & Related Documents		
		Elizabeth Anderson	Elizabeth Anderson	
		Eric Chatfield	Eric Chatfield	
		Richard J. Lee	Richard J. Lee	
		Earl D. Lovick	Earl D. Lovick	· .
		James R. Millette	James R. Millette	
		Paul Peronard	Paul Peronard	
		Chris Weis	Chris Weis	
		Julie Yang	Julie Yang	
		Charles Young	Charles Young	
		Deposition Notes		
748-000682-001	28	Privilege Logs & Related Documents (Matt Cohn's Box)		
		Defendant's Privilege Log & Related Documents	<u> </u>	
		Plaintiffs Privilege Log	<u> </u>	48WAULT 748-000682-001
				Sections Arthur & Records Management
		Cost Documentation & Related Documents		Leen with their en the and their text of the state of the
		Financial Information for Trial		04/01.
		IT Group Audits		02/00 ₂
		IAG Progress Report (DOT)		11/19/2002
		RA Project Evaluation Form		2002
748-000683-001	29	Miscellaneous (Matt Cohn's Box)	-	
		Residential Tracking and Sampling Lists	f	· · · · · · · · · · · · · · · · · · ·
		List of Properties to be Sampled		
		Sampling Information		740 000602 004
		Concordance Information		
		Settlement Discussion Documents		Business Archives & Records Attacagement
		FOIA Requests		
		Correspondence		- I STRUMENT HAN AND DESIGNATION OF THE PROPERTY OF THE PROPER
		Notes & Pictures	 	
		Emails & Reports	l	
		Caselaw re: Exceptions to the Administrative Record		
48-000684-001		Miscellaneous (Matt Cohn's Box)		
		Material from the "Conference on Asbestos and Public Health"		740 00004 004
		Articles, Reports, Research		748-000684-001
		Phase 2 Sampling and Quality Assurance Project Plan (QAPP)- Revision 0	-	Business Arthorn & Bressels Management
				ANX FR. A.B. ADDIES AND AREA DIT SE AND AREA SE SE

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Barcode	Box#	Type of Document	Person(s)	Date Range] '
		Sampling and Quality Assurance Project Plan (QAPP)- Revision 1] _
		Articles, Reports, Research]
748-000685-001	31	Miscellaneous (Matt Cohn's Box)			
		Comments re: Export/Screening Plant Removal Action Administrative Records & Related Documents		9/28 dod	AULT 748-000685-00
<u> </u>		W.R. Grace Comments re: 05/02/02 Action Memo Amendment and Supplemental AR #2; Supplement to Comments re: Original and Supplemental ARs	<u> </u>		
		Administrative Record Index - Export/Screening Plants, Supplement #1, Supplement #2			i Bushinismi and debines here con der Freehving en de
		Documents from Supplemental AR (5 folders)			1
	32-35	Privilege Documents			
		Privilege Documents (Libby #1)			
	36-37	Privilege Documents		<u> </u>	
,		Privilege Documents (Libby #2)			
	38	Privilege Documents			
		Privilege Documents (Libby #3)			
	39-95	Produced Documents	<u>,,, ,,, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,</u>		
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PRIVILEGED AND CONFIDENTIAL

Oil Discharge Exxon Mobil- Yellowstone River spill referred to the Department of Justice (Spill location – Yellowstone County, Montana)

On March 14, 2013, a referral was sent to the Department of Justice (DOJ) for Clean Water Act (CWA) violations related to ExxonMobil's July 1, 2011 discharge of approximately 1,509 barrels (63,378 gallons) of crude oil from its Silvertip Pipeline into the Yellowstone River that runs through the towns of Laurel and Billings, Montana. The Yellowstone River was at flood stage during the spill event causing significant impacts to wildlife (100 animals dead/ 155 oiled, cleaned and released); forcing the temporary closure of drinking water intakes; and impacting approximately 240 miles of river shorelines, floodplains, and riparian areas in varying degrees.

EPA responded to the incident, with On Scene Coordinators overseeing cleanup activities. On July 6, 2011, EPA issued an Administrative Order (AO) to ExxonMobil for cleanup under section 311(c) of the CWA, 33 U.S.C. § 1321(c). Montana issued a Letter of Violation to ExxonMobil on August 17, 2011 and subsequently an Administrative Order on Consent in early 2012, collecting a cash penalty and additional Supplemental Environmental Projects to be determined at a later date.

EPA's referral requests that DOJ file a civil action for penalties against ExxonMobil for discharging crude oil into waters of the United States in violation of section 311(b)(3) of the CWA, 33 U.S.C.§ 1321(b)(3), as amended by the Oil Pollution Act of 1990. Section 311(b)(3) of the CWA is non-delegable, meaning that EPA Region 8 enforces oil spill violations in all Region 8 states and Indian country.

Information only – no action required by the Regional Administrator

Program Contact: Inman.Donnak@epa.gov	303-312-6201
Legal Contact: Morris.brenda@epa.gov	303-312-6891
Darcy O'Connor, TEP Director	303-312-6392
Jennifer Schuller, TEP Supervisor	303-312-6334

∪ate Mailed	Label/Addressee/Cert #	CC/DCC IIST	From	Ke:	s
5/8/	Ladore Supper Club and Saloon P.O. Box 6044 Sheridan, WY 82802	Peggy Livingston Kathlene Brainich	US EPA; Region 8 Peggy Livingston, Attorney (MC 8ENF-L) 1595 Wynkoop Denver, CO 80202	EPA's Opposition to Motion to Dismiss to Ladore Supper Club	2/8/13
	cert # 7009 3410 0000 2592 8444				
113/1	Mr. Dammon Frecker Red Desert Reclamation, LLC One Cate Street, Suite 100 Portsmouth, NH 03801 cert # 7009 3410 0000 2592 8444	n/a	US EPA, Region 8 Randy Lamdin (MC 8ENF-RC) 1595 Wynkoop Denver, CO 80202	RCRA with Tom Sitz	2142142
Date	Label/Addressee/Cert #	cc/bcc list	From	Re:	Di
Mailed					Si
3/14/13	Richard (Rick) Smith, Owner Ladore Supper Club and Saloon P.O. Box 6044 Sheridan, WY 82802 cert # 7009 3410 0000 2592 8451	Peggy Livingston	US EPA, Region 8 Peggy Livingston, Attorney (MC 8ENF-L) 1595 Wynkoop Denver, CO 80202	Request to omit additional copies of docs from prehearing exchange	2144143
3/14/13	James F. Holmes, President Liquid Waste Management, Inc. P.O. Box 888 Longmont, CO 80501 cert # 7009 3410 0000 2598 4358	Amy Swanspon	US EPA, Region 8 Amy Swanson, Attorney (MC 8ENF-L) 1595 Wynkoop Denver, CO 80202	opportunity to confer, settlement communication, not admissible subject to federal rule of evidence	2144142
3/14/13	Ignacia S. Moreno, Assistant Attorney General United States Department of Justice Environment and Natural Resources Division P.O. Box 7611 Ben Franklin Station Washington, DC 20044-7611	Mark Pollins, Director Water Enforcement Division United States EPA Headquarters (2201 A) Ariel Rios Building 1200 Pennsylvania Avenue, N.W. Washington, D.C. 20460	Brenda Morris, Attorney (MC 8ENF-L) 1595 Wynkoop Denver, CO 80202	Yellowstone	0717716

	Date Mailed	Label/Addressee/Cert #	cc/bcc list	From	Re:	Date Signed
	3/14/13	·	Pamela J. Mazakas OECA United States EPA Headquarters (2241 A) Ariel Rios Building			3/14/13
7	-		1200 Pennsylvania Avenue, N.W. Washington, D.C. 20460		÷	
ω	3/14/13		Cynthia Giles OECA United States EPA Headquarters (2201 A) Ariel Rios Building 1200 Pennsylvania Avenue, N.W. Washington, D.C. 20460			3/14/13
ത	/14/1	Brunnelle's Pest Control P.O. Box 1304 Wolfpoint, MT 59201 cert # 7009 3410 0000 2592 0585	n/a	Brenda Morris, Attorney (MC 8ENF-L) 1595 Wynkoop Denver, CO 80202	Resend Penalty Complaint & Notice of Opportunity for Hearing	
10						
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12						

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S. COLEMAN – ATTORNEY WORK PRODUCT – DO NOT RELEASE

Direct Exam of Patrice K. (DRAFT)

Background

Name

Testified before in Federal Court? On what issues?

Current Employment/Title

- EPA – Director of the Fiscal Management and Planning Program within the Office of Technical Management Services

How many years have you been in this position?

- Employed with Region 8 for two years in this position, but employed with EPA for twelve years.

Describe employment history with EPA – held other positions?

- Employed with EPA for twelve years.
- Other Positions Held:

Current Responsibilities

- Supervise the Superfund Cost Recovery Team that compiles site-specific costs incurred by EPA in connection with a CERCLA response action into a cost report.

Recognition of Cost Report

Pull up Exhibit xx - Revised Cost Report

Have Patrice look at the Cherokee Site Cost Report

What is Exhibit xx?

- Cost Report generated by EPA for the Cherokee Street Site

How do you recognize it as such?

- The subject line states that it is the full cost package report for the Cherokee Street site and it also lists the site identification number — which is #08SL. I supervised the work of staff that prepared the cost documentation packages and this cost summary report for Cherokee Street, completed a final review of the cost package report, and ultimately approved the cost package report.

What is the date of this cost report for the Cherokee Site?

- February 26, 2003

Is that your signature found next to the "from" caption on the document?

- Yes

Swanson, Amy

To:

Meredith, Sienna

Subject: Attachments: Lambert Opportunity to Confer Letter 130314.Lambert.opptoconfer.fin.docx

Hi. Please take a look and make any changes you deem appropriate to the attached Lambert opportunity to confer letter. I'm pressed on time today to discuss Crow and Lame Deer, but am open Monday between 9:30 and 11:00 am. Can I call you then? Thank you,

Amy Swanson, Senior Attorney Legal Enforcement Program (8ENF-L) U.S. EPA Region 8 1595 Wynkoop Street Denver, CO 80202-1129 Phone: (303) 312-6906

Barcode	Box#	Type of Document	Person(s)	Date Range	
748-000622-001	1	Pleadings and Exhibits in re Civil Action No. 01-72-M-DWM			740 000000
		Exhibits for U.S.'s Motion for Partial Summary Judgment on Response Costs and on Defendants' Second		doWAULT	748-000622-001
	l	Affirmative Defense (Volumes 1 and 3 / Exhibits 1 22, 31 42)		Bosiness Archives & Bacardo Management	
		U.S.'s Motion for Partial Summary Judgment on Defendant's Third Affirmative Defense and Exhibits 1 18			
		U.S.'s Motion for Partial Summary Judgment on the Liability of W.R. Grace & CoConn. And on W.R.			
	ļ	Grace & CoConn.'s First and Fourth Affirmative Defenses, Statement of Uncontroverted Facts, Brief in	l		
	<u> </u>	Support, Exhibit List, Volume 1 of 3: Exhibits (1 – 22)			
		Exhibits for Second Affirmative Defense (Volume 3 of 3, Exhibits 31 42)			•
		U.S.'s Motion for Partial Summary Judgment on Defendant's Third Affirmative Defense, Brief in Support,	·		
		Statement of Uncontroverted Facts, Exhibit List, Exhibits 1 – 18		10/11/2002	
		Exhibits for U.S.'s Motion for Partial Summary Judgment on the Liability of W.R. Grace & CoConn. And on W.R. Grace & CoConn.'s First and Fourth Affirmative Defenses			
		U.S.'s Motion in Limine to Strike Portion of the Proposed Testimony of Dr. Richard J. Lee, Brief in Support,			
[Proposed Order, Exhibit List, Exhibits 1 10		10/11/2002	
		HRO letter enclosing W.R. Grace & Co. privilege logs, Defendants' Response to U.S.'s Motion in Limine to			
		Strike Portions of the proposed testimony of Dr. Richard J. Lee, Exhibits A, B, 1 – 35, Defendants'		į	
		Response to U.S.'s Motion in Limine to exclude the Expert Report and Testimony of Dale Jensen, Exhibits			
		11 – 14		10/31/2002	
748-000623-001		Documents for Civil Action No. 01-72-M-DWM	<u> </u>		
		Privilege log			
		Final draft of ISO International Standard for ambient air determination of numerical concentration of		- PWALII T	748-000623-001
		inorganic fibrous particles scanning electron microscopy method		Deliver Andrea 4 Franch Alexander	7-40-000025-001
		R.J. Lee Group ISO data compiled from EPA Excel Spreadsheets			STREET ONLY THE HAZA AL
		R.J. Lee Group Report: Analysis of January 2000 indoor and outdoor air samples			
		U.S. Motion for Partial Summary Judgment on Response Costs and on Defendants' Second Affirmative		- CONTRACTOR CONTRACTOR	re Beie exerane ander endry has
		Defense (Volumes 1 - 3 / Exhibits 1 - 42)		11/2/2002	•
748-000624-001	3	Pleadings for Various Actions/Reports/Correspondence/Deposition			
		Superfund reports/documents		6/0/1	
		Asbestos and health documents		RALHT	748-000624-001
		Fiber contamination of Vermiculites re Libby #1 - environmental research		Business Arthres & Records Management	
		Libby #1 - Radiology Survey by Sebastien, et al., Cohort study of mortality		(Alleghenne au sic sie	Dilleri del di desti di di
		Libby #2: Pleural effects			
		Exposure to Crocidolite and Mesothelloma		Otol 1990 '	nayna mag na ni i felik (1886-188 B) ali. MP
		Expension to discussion and modernation	<u>. </u>	0/0/1990	

Barcode	Box#	Type of Document	Person(s)	Date Range
		Exposure to Tremolite and Respiratory Cancer in New Caldonia: A Case Control Study		0/0/2000
		Progression of pleural and parenchymal disease		0/0/1997
		Vermiculite Producers and Users		9/0/1988
		X-ray evidence of increased asbestos exposure		0/0/2000
		Internal fax re causality		8/12/2002
		Internal fax re FOIA request in re CDC, NIOSH and ATSDR		8/22/2002
		Consolidated Arvin cases: CV-F-92-5068 OWW, CV-F-96-6226 OWW, and CV-F-96-6228 OWW		
		Findings of Fact and Conclusions of Law		5/24/2002
		CV-91-4098 EPA's Allocation Methodology re Non-site Specific Costs		10/15/1993
		No. 4:97 CV 1557 CDP Memorandum and Order		9/15/1999
		CV F 92-5373 Memorandum Opinionto Enforce Consent Decree		1/12/2000
		W.R. Grace Interests		6/10/2002
		EPA's Response to 12/21/2002 Comments from W.R. Grace re the Supplement to the Export/Screening Plant AR		
		W.R. Grace's Comments		12/21/2001
		Attorney-Client Privileged Response to W.R. Grace's Comments received 7/31/2002		8/11/2002
		W.R. Grace miscellaneous correspondence		4/14/1969 - 7/15/1985
		Superfund Audit Report Phase 2 Sampling		5/15/2001
		Memo re Milwaukee Plant and MonoKote		8/1/1973
		U.S.'s Response to Defendants' Briefto reopen AR		10/22/2002
		Civil Action No. 01-72-M-DWM HRO's request for progress report re costs	· · · · · · · · · · · · · · · · · · ·	10/17/2002
	1 1	U.S.'s Motion and Brief Requesting Leave to File Additional Factual Materials in Summary Judgment Replies	· · · · · · · · · · · · · · · · · · ·	11/12/2002
		U.S.'s Reply to Defendants' Response to Motion for Partial Summary Judgment on Response Costs and Defendants' Second Affirmative Defense, attachments and exhibits	****	11/11/2002
		Memos, testimony, report		3/13/2000 6/2/2002
		Deposition of Arnold R. Brody		9/30/2002
		Tremolite report, HRO and DOJ correspondence re Civil Action No. 01-72-M-DWM		4/2/1985 - 10/11/2002
		W.R. Grace's Motion to Reschedule Pretrial Conference Date and supporting Brief		10/24/2002
		Memos, articles on asbestos		0/0/1993 10/1/2002
		Unsigned U.S.'s Unopposed Motion and Brief of the U.S. to withdraw certain claims with prejudice		0/0/2002
		Summary Report of particulate found after destruction of the World Trade Center		10/12/2001
		Health-based Soil Investigation Levels Australia		5/24/2002
-		Civil Action No. 01-72-M-DWM (D. Mont.) Defendants' Reply to the U.S.'s Response to Defendants' Brief re Order to Require EPA to Reopen the AR and exhibits		10/31/2002
		U.S.'s Motion in Limine to Exclude the Expert Report and Testimony of Dale Jensen and exhibits and Brief and Proposed Order+B25		10/11/2002

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Barcode	Box#	Type of Document	Person(s)	Date Range
		,		
748-000625-001	4	Documents in re Civil Action No. CV-00-167-M-DWM and Civil Action No. 4-88-822 and	Į.	
7-70 000020 001		Chapter 11, Case No. 01-01139(JKF)		
Ĺ		Civil Action No. CV-00-167-M-DWM		
		Notice		2/8/2001
		Defendants' Prediscovery Disclosure Statement		11/7/2000
		Order		3/9/2001
		U.S. Preliminary Pretrial Statement and draft thereof		
		Joint Discovery Plan		
		Defendants' Motion to Transfer Venue to the District of Delaware		7/17/2001
		U.S.'s Unopposed Motion and Brief for Extension of Time to Respond to Defendants' Motion and		
		Proposed Order		7/27/2001
		W.R. Grace's Preliminary Pretrial Statement		8/29/2001
		Order		9/6/2001
		Defendants' Unopposed Motion for Conducting Preliminary Pretrial Conference by Telephone		10/4/2001
		Proposed Order		10/0/2001
		Signed Order		10/5/2001
		Notice of Lodging, Consent Decree		10/23/2001
		Signed Order re oral argument	,	12/5/2000
		Signed Order re telephonic status conference		10/15/2001
		Oral Argument - Transcript of Proceedings between EPA and W.R. Grace		12/20/2000
		Bankruptcy case documents in re Chapter 11, Case No. 01-01139(JKF)		5/10/2002
		Bankruptcy case documents in re Chapter 11, Case No. 01-01139 and Case No. 01-01200		
		Western Minerals Site map and sampling data (Rec of Comm)		3/27/2002
		Toeroek Analysis of W.R. Grace's Response to EPA's 6th 104(e) Information Request		9/5/2001
		Measurement of Asbestos Air Pollution Inside Buildings Sprayed with Asbestos		8/0/1980 7/9/2001
		Bureau of Mines report, "Selected Silicate Minerals and their Asbestiform Varieties" by Campbell, et al.		
		Expanding Plants information		6/14/1961 - 7/19/2000
		ASTM International - 2002 Johnson Conference: A Review of Asbestos Monitoring Methods and Results		
į		for the New York World Trade Center, etc.	ļ	7/21/2002 7/25/2002
		Raintree NurseryMel and Lerah Parker and familymiscellaneous letters, pictures, information		3/0/2000 - 4/28/2001
				······································
		Civil Action No. 4-88-822 Access Case Hams Jorgensen and Isabel Jorgensen v. Carey-Canada, Inc.,		
		et al. documents		
		Fibers for Mark Raney	1	9/23/2002

SVAULT 748-000625-001

Enforcement Confidential Attorney Work Product

Barcode	Box # Type of Document	Person(s)	Date Range
	Libby timeline		4/19/2002
	Summary of Agency Risk Issues for Libby, Montana		2/7/2002
	Superfund Program Management		2/0/1995
	CERCLA original copies		

Barcode	Box#	Type of Document	Person(s)	Date Range	
		MATT'S MISCELLANEOUS BOXES			
48-000626-001	1	Concordance slay at Toerock		<u> </u>	-stay at
_		Adapter, Concordance Dataflight software, Concordance Information Retrieval System handbook, related manuals and guides			Toeroen
48-000627-001	2	Toeroek's CD's Slavy at Talvolk			-0.0
40-00-027-001		Toeroek's CD's CD's of extra copies of Libby Site file		d8WAULT	748-000627-001
627				Spilores Archives & Barnels Hanngsment	
48-000628-001	3	Duplicates from Libby Asbestos File Review			
		W.R. Grace's Comments to EPA's 3rd Action Memo with exhibits and attachments		E INCHER OF HIGH	
48-000629-001	4	Deposition and Notes/Reports/Analyses/Operating Procedures			•
		Deposition of Lee			
		Lee Preliminary Report		RYAULT	748-000629-001
1		Standard Operating Procedures, core samples, soll samples, air samples, Silica analyses, SAED studies,		Backers Archives & Records Management	
ļ		deposition notes for Rich Lee, C. Weis and Meeker, analyses of air samples, Lee's Expert Report, ISO			
}		EDS reports, AHERA EDS reports, airborne asbestos methods, Asbestos Investigation grids, OSHA	•		
		health effects and other files, RJLG-NVLAP, Lee CV and Publication List		7/18/1977 9/11/2002	
48-000630-001	5	Loose Documents		<u> </u>	740 000000 004
		Document database, briefs, reports, analyses, grids, letter re status of AR, test reports and results,		doyAULT	748-000630-001
		memos, log of WRG's privileged documents		E Bacinesa Archices & Records Management	

Barcode	Box#	Type of Document	Person(s)	Date Range	
not delivered	Note- book	United States' Designation of Experts: Arnold R. Brody, Ph.D., James E. Lockey, M.D., MS, Gregory P. Meeker, James R. Millette, Ph.D., Fredric L. Quivik, Ph.D., Alan C. Whitehouse, M.D., Wiley Wright III, CPA, Charles Young		7/31/2002	
748-000631-001	- 1	Finstad v. W.R. Grace and Company	 		
740-000631-001		Employee Exposure Summaries		3/ (740 000004 004
		Finstad v. W.R. Grace and Company Transcript of Proceedings	+ +		748-000631-001
		Finstad v. W.R. Grace and Company Transcript of Tracebulligs Finstad v. W.R. Grace and Company Appeal Exhibits Volumes I and II	 	Burlines Archines & Reserve Management	
		Finstad v. W.R. Grace and Company Appear Exhibits volumes rand in	 	5/6/199	
		Tilistad V. W.N. Grace and Company Transcript of Proceedings	 		
748-000632-001	2	Employee Exposure Summaries	1		•
		Employee Exposure Summaries		3/	748-000632-001
				dödAULI	746-000632-001
748-000633-001		Corporate Documents		Benincus Anchorus & Records Miningement	iki di 22 mil 190 din 180. 16. 80.
		W.R. Grace corporate documents Plaintiff's Brief in Opposition of Defendant's Motion to			
		Dismiss and exhibits	1	9/	missistismenta n.
		W.R. Grace corporate documents S-4 Registration Statement under SEC Corporate fraudulent conveyance Plaintiff's Brief in Opposition of Defendant's Motion to		8/2/1996	
		Dismiss		1/13/2000	
		W.R. Grace & Co. Annual Report Form 10-K405		0/0/1007	
		NESHAPS documents Consent Decree, privileged documents, press releases		12/23/19	740 000000 004
		Fresenius Medical Care Holdings Inc./NY 10-K405		3/2 dodAULT	748-000633-001
		Fresenius Medical Care Holdings Inc./NY 8-K		2/1	
		Fresenius Medical Care Holdings Inc./NY 10-K405		3/ <u>9</u> 8/:	
		Sealed Air Corp/Delaware Registration Statement			HATH AND PARTY OF THE PARTY OF
		Employee Exposure Summary		6/6/1900	· · ·
			<u> </u>		
748-000634-001	- 4 -	Motions / Pleadings / Court Filings/Title Search	[
		Libby Asbestos Site Draft Title Search Report by Toeroek Associates; Title Search	1		- 40 000004 004
[documents: Sites #1-3, Appendix C Title Trees, Sites #4-5, Sites #1-4, Site #5, Figures]	48 XAULT	748-000634-001
-		Plaintiff's Brief in Opposition of Defendant's Motion to Dismiss for Lack of Personal	 	Qualitates Archives & Records Management	
ţ	1	Jurisdiction and exhibits]		
		anianian ania aninara	 		

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748-000635-001	5	Corporate Documents Colorado/New York/Montana Secretary of State and On-line	;		
		Certificates of Merger, Agreement and Plan of Merger for Wayne Candies, Inc.; Pearce, Mayer & Greer, Inc.; Pix of America, Inc.; and other companies; Notices, Connecticut Secretary of State documents, Notice of Election or Appointment of Officer/Director		7/: d8MAULT	748-000635-001
		W.R. Grace & Co. and Fresenius National Medical Care Holding, Inc. Forms 8-K, 10-K's, 10-Q's, Proxy Statements, Annual Reports, Independent Auditors' Consent Lincoln County District Court Defendant's Brief in Support of Motion to Dismiss for Lack of			
		Personal Jurisdiction]	4/26/1999	1
		New York Secretary of State Application to do business in New York, Tax Commission certifications, Certificate of Merger, Certificates of Change and Amendment of Application of Authority, Certificate of Incorporation, Biennial Statements for W.R. Grace and Fresenius			
<u></u>		National Medical Care Holdings, Inc.	 	12/15/1999 — 3/0/2000	
		Web site: History, letter to Grace Shareholder, Libby Issues and Answer	 	4/9/1988	
		Articles of Amendment, Articles of Merger, Articles of Organization for Delka Corporation, Certificates of Change of Address, Change of Directors, Massachusetts corporation Annual		•	
		Report		12/9/1974 12/31/1998	
,		Denver Public Library: newspaper economic information on corporations, Montana Department of Environmental Quality Web Page		1960 2000	·
		W.R. Grace & Co. File Review Summary re Libby Asbestos Timeline of Events	1	1881 1999	7
		KnowX.com, www.prnewswire.com, www.nytimes.com Business reports on W.R. Grace & Co., Sealed Air Corporation, Fresenius Medical Care Holdings		11/28/2000 1/16/2001	
		www.fmc-ag.com Business reports, tax background checks on W.R. Grace & Co., Sealed Air Corporation		11/28/2000 2/9/2001	
		Sealed Air Corporation: General Shareholder Information, news releases, 1998 Annual Report; Abner v. Asbestos Defendants civil proceedings in San Francisco County, California		1998 4/27/2001	
		Kootenai Development Company Annual Report		2000	
740 000000 004		N. A. L L.	<u> </u>		
748-000636-001	6	Notebooks Finstad v. W.R. Grace and Company Appeal Exhibits	 		
		Workers Dead from Asbestos Disease Exhibit 225	 		•
		Finstad v. W.R. Grace and Company Transcript of Proceedings	 	5/3/1! d8 YAULT	748-000636-001
		Marcor Remediation, Inc. Health and Safety Plan	 	Sminers Archives & Records Management	
		Kootenai Development Company Flyway Property Final Removal Action Work Plan	 		HE181141821151151163710
		Draft SAP for Remedial Investigation Contaminant Screening Study at Libby OU4			
		Kootenai Development Company Kootenai Bluff Property Final Removal Action Work Plan		712112001	•

Barcode		Type of Document	Person(s)	Date Range] .
		Final Site Health and Safety Plan Screening Plant TO #4 prepared for U.S. Department of	f T		7
		Transportation		6/20/2000	1
					7
748-000637-001	7	Specifications/Plans/Reports			1
		Libby Middle School Track Reconstruction Technical Specifications		10/12/2001	
		Draft Libby Middle School Removal Action Work Plan]
		Libby Asbestos Project Stimson Lumber Company Draft Sampling and Analysis Plan		1.0000	7
		Libby High School Track Reconstruction Final Technical Specifications		1'	748-000637-001
		Final Screening Plant Removal Action Plan		Edocati	746-000037-001
		Final Work Plan Kootenai Bluff		annes Actores a major Management	a first ball and 49:41c.414; .4.40
		Export Plant Final Removal Action Plan		ξ , , , , , , , , , , , , , , , , , , ,	
		Revised Proposal – Planning and Logistics and Field Office Setup		E I I I I I I I I I I I I I I I I I I I	HINEF THE DESIGNATION
		Screening Facility Final Removal Action Plan		8/14/2001	1
		OU4 Final Sampling and Analysis Plan Contaminant Screening Study		4/0/2002	1
		Records of Deviation/Request for Modification		4/4/2002]
		March 2000 Sampling Effort		3/0/2000	
		Sample Results for Topsoil, Kalispell, Montana		5/15/2001	7
		Final Report RES 75788 1 and 2 CDM Federal Programs Libby		7/18/2001	1 .
		Health and Safety Plan Form Residential and Service Sampling	· · · · · · · · · · · · · · · · · · ·	12/7/1999	1
		Libby High School Equipment Replacement Summary Report		12/10/2001	1
		Site Visit Report by MWH		2/26/2002	
		Project Work Plan Siefke and Browlee Properties		10/0/2001	
		Project Work Plan Siefke and Browlee Properties Addendum #1		10/0/2001	ĺ
		Work Plan Phase I Assessment Libby		12/0/1999]
		Health and Safety Plan Inventory and Cleanup		7/0/2001	1
		Health and Safety Plan (former Railroad Loading Facility)		4/0/2001	
		Project Work Plan Inventory and Cleanup		7/0/2001	·
748-000638-001		Depositions and Exhibits			
		Deposition and exhibits of Julie Yang		0/24/2000	
		Documents related to Julie Yang's depo			748-000638-001
		Deposition and exhibits of Charles Young			7-10-00000-001
<u></u>		Documents sent to EPA to attach to Elizabeth Anderson's Report		9/30 Business Architect & Records Management	oetshihitetti ti ili
		Documents sent to EPA to attach to William Hughson's Report			
					El l'Al 29: 43: Eta 119: ch 41:

Barcode	Box#	Type of Document	Person(s)	Date Range	<u> </u>
748-000639-001	9	Corporate Documents			7
		B03 Lincoln County corporate documents, deeds	y.	12	
		CO1 EPA Purchase and Sale Contract with Kootenai Development Company, corporate		48VAULT	748-000639-001
		documents		10/17/19! Notice Address & Barrell Management	
		CO2 Zonolite corporate documents		3/1963	K HAV FARA 1990 SST AN TIRO DARE AN ATT
		CO4 W.R. Grace & Co. Annual Reports		197	
		CO5 Delaware Secretary of State corporate documents		3/31/199	1
		CO6 Connecticut Secretary of State corporate documents		5/31/1929 9/15/1969	
748-000640-001	10	Expert Report/Pleadings		· · · · · · · · · · · · · · · · · · ·	
		Fredric L. Quivik, Ph.D. Expert Report	1		-1
		Defendant's Response to U.S.'s Motion for Partial Summary Judgment on Costs and on	1 1		749 000640 004
		Defendant's Second Affirmative Defense	1	dowave	748-000640-001
		Plaintiff's Brief in Opposition to Defendant's Motion to Dismiss for Lack of Personal	 	Marith Fill At 11 E 11: 11: 11: 1	MARCHANIA DE DE
		Findings of Fact and Conclusions of Law re Motions of the Debtors and Asbestos Property	· ·		
		Damage Committee to Exclude Evidence	1	, made and many many many many many many many many	
(4)					7
748-000641-001	11	Corporate Reports/Agreements/Bankruptcy Brief/Title Search			
		Corporate Officers and Directors of W.R. Grace and Company and Associated Entities			7
		prepared by Toeroek Associates	<u> </u>	9/6/2001	·
		Interim Corporate Report A B03 Lincoln County Clerk and Recorder deeds to Kootenai			
		Development Company		11/3(•
		Interim Corporate Report B B03 Lincoln County Clerk and Recorder deeds to Kootenai		DVAIL T	748-000642-001
		Development Company		11/30	10 0000 12 00 1
		Interim Corporate Report A C01 EPA Plaintiff's Brief in Opposition to Defendant's Motion	1	A DESCRIPTION OF THE PERSON OF	- 160 (TE 10 E 10 E 10 E 10 E 10 E 10 E 10 E 10
		to Dismiss for Lack of Personal Jurisdiction and exhibits			
İ		Purchase and Sale Contract between W.R. Grace and Company and Kootenai Development	1 1	1 7607.120.2000.007.007.007.007	(F11 (F11)(1)(1) (F1)
		Company	 	10/17/1994	
		W.R. Grace and Company's Informational Brief Chapter 11 in Bankruptcy Court	<u> </u>	4/12/2001	
		Agreement and Plan of Reorganization between W.R. Grace and Company and Zonolite	1		
		Company	ļ	2/21/2001	1
		Libby Asbestos Site Draft Title Search Report by Toeroek Associates		2/21/2001	1
		Preliminary Findings of W.R. Grace Corporate Structure by Toeroek Associates	.LL	1/8/2001	j

Barcode	Box#	Type of Document	Person(s)	Date Range	
		Interim Corporate Report B C01 EPA Plaintiff's Brief in Opposition to Defendant's Motion	ĺ		
1		to Dismiss for Lack of Personal Jurisdiction and exhibits, Transaction Structure, Purchase]].		
		and Sale Contract between W.R. Grace and Company and Kootenai Development Company	1	10/17/1994 1/13/2000	
		Interim Corporate Report A CO2 W.R. Grace and Company 1981 Facilities Audit		2/8/1982	
		Interim Corporate Report B CO2 W.R. Grace and Company 1981 Facilities Audit		2/8/1982	-
		Interim Corporate Report A CO4 www.freeedgar.com Registration Statement, Fresenius			
		Medical Care Holdings Inc./NY 10-K 1995	i i	3/29/1996 3/13/1998	j .
·		Interim Corporate Report A - CO4 www.freeedgar.com - W.R. Grace and Company 2000			
		Annual Report	1	4/16/2001	
		Fresenius Medical Care Holdings Inc./NY 1996 Annual Report		3/31/1997	
	ļ	Interim Corporate Report B CO4 www.freeedgar.com - W.R. Grace and Company 2000	1		
		Annual Report		4/16/2001	
		Sealed Air Corp/DE 2000 Annual Report		3/23/2001	
	L	Fresenius Medical Care Holdings Inc./NY 2000 Annual Report		4/2/2001	
 		W.R. Grace and Company 2000 Annual Report		4/16/2001	
	İ	Interim Corporate Report B — CO4 www.freeedgar.com — W.R. Grace and Company			
		Registration Statement		3/13/1998	
		W.R. Grace and Company 1998 Annual Report		3/29/1999	
141	L	Fresenius Medical Care Holdings Inc./NY 1995 Annual Report		3/29/1996	1
					140 000044 004
748-000642-001	12	Corporate Interim Reports		devault 7	748-000641-001
		Corporate Interim Reports		Guelacas Archives & Racards Management	•
740 000040 004	40				
748-000643-001	13	Corporate Report/Trial Experts			
		W.R. Grace Draft Interim Corporate Report		0/00/0000	⊣
		W.R. Grace's Designation of Experts		8/30/2002	⊣
		W.R. Grace's reports and rebuttal from the following experts: Elizabeth Anderson; EPA's	ļ		I
		Response to comment from Elizabeth Anderson; Henry Anderson, R.E. Bartelt, Eric Chatfield,			110 000010 001
		Thomas, Dahl, G. Hughson, D.R. Jensen, Richard Lee, J. Lockey		48MAULT 7	48-000643-001
		U.S.'s Designation of Experts		Business Archives & Hacards Management	
		U.S.'s report and rebuttal from the following experts: Arnold Brody, James Lockey, Gregory	i		
		Meeker, Suresh Moolgavkar			
					_1

Barcode	Box#	Type of Document	Person(s)	Date Range
748-000644-001	14	Rebuttal Experts	·	
		U.S.'s reports and rebuttals from the following experts: James Millette, R.M. Turkewitz, Alan	·.	18YAULT 748-000644-001
	{	C. Whitehouse, W.R. Wright, Charles Young	1	7/2! Surfaces Author's & Personals Management
		U.S.'s designation of rebuttal experts and rebuttal reports from: H. Anderson, R.J. Lee		448 405 1110 47 115 114 114 117 1 5 6 6 6 110 11 1 1 1
	ł	Group, Inc., Gregory P. Meeker, James Millette, Rob Turkewitz		7/3
		Oral histories relied upon in Expert Report of Fredric L. Quivik, Ph.D. Folders 1-4		4/26102 3122102
748-000645-001	15	Depositions and Exhibits		
	<u> </u>	Elizabeth Anderson		9/27/2002
		Richard Bartelt		9/24/2002
		David Croce		0/27/2002
		Stephen Dearwent, Jr.		740 00004F 004
		Dannie Middleton		&MAULT 748-000645-001
	<u></u>	Jeffrey Lybarger		Susiness Arthres & Razonds Managrainnes
		Harry Eschenbach		
		William Hughson		ENDANTADO DE LA HATISTA DE PORTES DE
		William Hurley		0/10/2002
		Dale Jensen		9/20/2002
		Kathleen Kirkland		9/6/2002
		Michele Koppelman		9/4/2002
748-000646-001	16	Depositions and Exhibits		
		Richard Lee File 2 of 2		71001000
		James Lockey		749 000646 004
		John McGuiggin		
		Gregory Meeker		business Archives & Records Management
		James Millette		
		Eric Moeller		I BERNIER BEDI AU MES TEK BESI ESKAN DAS BESI DER FR 22
		Sureh Moolgavkar		9/30/2002
		Mark Owens		8/16/2002
48-000647-001	17	Depositions		
]		Deposition of Paul Peronard		
		Deposition of Fredric Quivik		I WAULT 748-000647-001
		Deposition of Lester Skramstad		Business Authoria & Seconds Management
		Deposition of Alan Stringer		I A DE COLOR CONTRA DE CONTRA DE TRANSPORTA DE CONTRA DE CONT

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	Deposition of Timothy Wall		8/13/2002
	Deposition of Christopher Weis		9/12/2002
	Deposition of Alan Whitehouse		9/6/2002
	Deposition of Robert Wilkins		6/27/2002
	Deposition of Colette Wilson		9/17/2002
	Deposition of Jack Wolter		9/12/2002
	Deposition of Wiley Wright		9/5/2002

Barcode	Box#	Type of Document	Person(s)	Date Range
748-000648-001	2	Julie Chi-Sun Yang, Ph.D. Depositions and Exhibits		<u> </u>
		17 depositions		12/20/1978 - 7/29/1998



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Barcode	Box#	Type of Document	Person(s)	Date Range		
		PRIVILEGED TRIAL PREPARATION				
748-000649-001	1	W.R. Grace Bankruptcy Privilege Logs		183	AU T	748-000649-001
		Privilege logs		9/25/2 ***************	nt & Security Management	7-70-000649-001
					i Albahir Baransa	Alialat tetrona a ar
748-000650-001	2	Trial Preparation				
		Also labeled box 5 which is part of set of 31 boxes. See index for 31 boxes for contents			1	anstan dutik it i
	•	description.			_	
		· ·		d®M	AULT	748-000650-001
748-000651-001	3	Trial Preparation		Sustance Areases	1 & Accords Management	7-0-00050-001
		#11 Demos, Libby PPP1-Stereo-PLM.ppt		9/24/:	i dinamentanan	Missostenessa
		Graphics, graphs, #31 and #106 exhibits		12/9/:		
		James Millette handwritten professional background as it relates to Libby		12/18/2002	Annan Cantal Challis	en en en en en en en en en en en en en e
		2 CD's: #12 and #36 Libby exhibits			7	
		Set 1: 2 of 2 invoices, time sheets	•	4/2/2000 - 1/2/2002		
		Draft and finalized EPA's Response to Comments Received on the Second Supplement to the			7	
		Export/Screening Plant Administrative Record		6/24/1905		•
		Holly Shook's memo and case law for EPA's Response to comments re Second Supplement to				
. [Export/Screening Plant, diskette of Shook memo re answer to W.R. Grace's Interrogatory 31				
				7/25/2002		
		Set 1: 1 of 2-Toeroek Associates timesheets				
		Toeroek Associates correspondence and time sheets		2/7/2000 11/27/2002		
		Dr. Eric J. Chatfield's Analysis re Vermiculite		9/4/2000		
		Published articles on asbestos in dust		4/9/2002	7	•
		Case law				
		Julie C. Yang, Ph.D. deposition		8/21/2002	d8WAUL	T 748-000651-001
		Dr. Richard J. Lee deposition		10/17/2000	Institute Archives & Records Manag	reset
		Handwritten notes for Trial Management Order re exhibits; draft TMO			(11/11/11/11	NTMAKANTATA DA BUDUNO DE SE
		Plan for Objections, exhibits, Libby database instructions		9/11/2002		
		Correspondence with marginalia between attorneys re exhibits		11/25/2002	1	
		Handwritten trial database basics		9/11/2002	7	
		Print-outs from exhibits database		1976 9/18/2002	7	
		Cause and effect trial preparation, Defendant's exhibits list, table of comments on certain			7	
		2002 EPA Revised Scenario Samples		12/10/2002	1	
		Printed copies of cost effects slides, paper by Dr. Wylie re discriminating amphibole			7	
		cleavage fragments from asbestos, article re lung tumors and asbestos		6/17/1905	Ī	
		Article by Dr. Chatfield re TEM specimens		8/0/1990	7	

Barcode	Box#	Type of Document	Person(s)	Date Range
		Case law, EPA definition of hazardous substances under CERCLA		
		Toeroek Associates' Initial Comments on document review		6/1/2001
		Miscellaneous notes re exhibits and voir dire		4/3/1979 11/17/2002
		Draft notes in preparaton of Chatfield deposition		
-		Chatfield analysis of TEM asbestos samples		9/25/2002
		Table of Lee deposition exhibits, case law, deposition notes for questioning		
		W.R. Grace memo re higher fiber counts with binder		8/22/1980
		Order re Sealed Air Corporation's motion to extend expert reports deadline		8/21/2002
		Deposition exhibit lists and related documents		5/9/2002 - 9/20/2002
748-000652-001	4	Reports/Studies/Testimony/Analyses		↓
	<u> </u>	Handwritten notes		
		Handwritten notes on Meeker and Millette Expert Reports, etc.		
		Libby Asbestos Site Administrative Record Index, Libby trial database entry sheets Administrative		.
		Record documents, Special Collections Index		11/11/2002
		Cost documentation for Remedial Administrative Record		11/19/2002
		Itemized Cost Summary (superceded)		10/1/1999 12/31/01
		Draft memo to EPA from Toeroek Associates re Libby Personnel, handwritten notes		2/5/2001
		EPA Work Performed lists		11/7/2002
		Case law in 9th Circuit re exceptions to the Administrative Record		<u> </u>
		Matt's trial exhibits - Kathleen Rest testimony		7/31/2001
		Lee - EPA error sheets; Lee - List of exemplars of Count Sheets		7/6/2000 — 9/23 do
		Letter from Michael Beard of EPA to Sally Sasnett of EPA re misrepresentation of analytical results		ľ
		for asbestos in bulk materials		11/3/1992
		USA Today article by Lee re high levels of asbestos in dust are an indicator of the need for cleanup		2/12/2002
		Bureau of Mines Health Study on asbestos dust		4/31973 4/12/1973
		Health and Safety Report - Asbestos Dust Survey Report		10/19/1971 10/21/1971
		Chatfield report: "Asbestos Measurements in Workplaces and Ambient Spaces"		
		Data Comparison of asbestos fibers		
		Asbestos Fiber Reentrainment During Dry Vacuuming and Wet Cleaning of Asbestos-contaminated		
Į.		Carpet		5/0/1991
		Libby Sample Results Summary Report		8/13/2002
		TEM Asbestos Structure Count		8/6/2001
		Phase 1 Quality Assurance Project Plan Environmental Monitoring for Asbestos		1/4/2000
		Phase 2 Quality Assurance Project Plan Environmental Monitoring for Asbestos		3/0/2001



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		R. Grace comments on Administrative Record for Export Plant and Screening Plant Removal		
		ions and WRG letter to EPA		3/24/1983 - 2000
		tudy of the Reproducibility of the Micro-Vac Technique by Hatfield, et al.		<u></u>
		pestos in Public and Commercial Buildings by Health Effects Institute	-	1991
		R. Grace memo re controlled drop air sampling on 7/23/1976 and drop test results		8/5/1976
	fron	Modeling Approach to Estimate Community Exposures to Airborne Asbestos Concentrations in Reentrained Road Dust" by Kira Lynch		7/31/1995
		sume and expert report by Gregory P. Meeker, "The composition of asbestiform phiboleresultsanalysis"		7/31/2002
	Соп	mments on Proposed Rulemaking on Measuring and Controlling Asbestos Exposure		6/27/2002
	Kat	hleen Rest testimony re Workplace Exposure to Asbestos	· · · · · · · · · · · · · · · · · · ·	7/31/2001
	in U	JSA Today by Lee dust needs cleaning		2/12/2002
	Mel	and Lerah Parker letter re tailing material from the roadway is a toxic hazardous material		1/20/2001
	Pho	otocopies of road photos from the Parkers		4/25/0000
	Lett	er from Benjamin Wake to Public Health Service		9/12/1956
	Chri	istopher Weis/EPA letter to W.R. Grace re methodology for analysis		4/4/0000
	Chri	is Weis memo to Paul Peronard re residual contamination		5/17/2000
	Men	no re tremolite problem from Wood to Brookes, et al.		5/24/1977
	W.R	R. Grace memo relightweight fertilizer customer fiber exposures		1/27/1978 - 2/15/1978
		le's report, "Discriminating Amphibole cleavage fragments from Asbestos: Rationale and hodology		11/0/1990
		e C. Yang's report, "Characterization and Preparation of Respirable Sized Tremolite Fiber and miculte for Animal Studies		4/8/1976
	Ahn.	, et al. report, "Microstructures and fiber-formation mechanisms of crocidolite asbestos		1991
	Ama	andus, et al. report on vermiculite miners and millers exposed to tremolite-actinolite		1987
	Dep	artment of the Interior "Contributions to Economic Geology" papers and reports		1928
	Sele	acted Silicate Minerals and their Asbestiform Varieties by Campbell, et al.		
	Hea	Ith Effects of Tremolite by Bruce Case		
	Dem	nos of amphiboles	··· · · · · · · · · · · · · · · · ·	
	Mee	ker Administrative Report summary fo Libby amphibole mineralogy		7/3/2001
	Vebl	len's report "Anthophyllite asbestos		1980
	Wyli	e's report, "The Habit of Asbestiform Amphiboles	-	
	Phas	se contrast microscopy		5/20/1977
	Yang	g's report, "Characterization"		4/8/1976
	Depo	osition Notes: handwritten		
	Draft	ts of EPA Response to W.R. Grace Comments re Supplement to Export/Screening Plant		

Barcode	Box#	Type of Document	Person(s)	Date Range
		Miscellaneous notes and pictures, memos		
		Actual distributions		8/22/1980 0/0/2002
		Fiber samples		
748-000653-001	_ 5	Defendant's Exhibits, Cost Recovery Backup		
	F	Tables of Defendant's Exhibits		11/26/2002
		Exhibit Index for Libby Asbestos Site cost recovery litigation created by Toeroek Associates		11/18/2002
		Tracking list for documents requested per Court Order to provide W.R. Grace with documents by 8/29/2001		
		Letter from DOJ regarding Libby-related documents to be sent to the DOJ		3/15/2002
		List of Affidavits for Libby #2		8/14/2002
		Production lists for Libby #1 and Libby #2		2001 - 2/4/2002
		R8 letters		7/26/2001
		HQ letters		7/20/2001
		Montana office letters		7/26/2001
		Miscellaneous letters		7/26/2001
		EPA Production List		, a
		Miscellaneous documentation, drafts, research		3/16/1981 - 10/23 7/16/2002
		E-mail and correspondence re mobile lab analysis of TEM grids		7/16/2002
		Handwritten notes and e-mail re cost documentation package and privilege log database		8/0/2001 5/20/
		Handwritten note re things to do		
		Concordance information		12/18/2002
		Tasks lists		
		Referral Report from EPA to DOJ re Libby #1		3/21/2001
		Libby #1 Document Coding Sheet and documents		2001
		EPA status update of Administrative Record to Holme, Roberts & Owen		7/24/2001
		Memo re legal research re "imminent and substantial endangerment"		8/9/2002
		Draft letter to W.R. Grace re settlement discussions		12/10/2002
		EPA memo re "no action" assurances		12/12/1995
` '		Summary of U.S.'s document production		11/19/2002
		Request for a Removal Action Ceiling Increase at Libby		7/12/2001
		Approval of Work Plan for W.R. Grace bankruptcy		5/28/2002
		DOJ draft letter re contract costs and recovery		5/30/2002
		E-mail re boxes of Libby documents, expert reports, scanning, CD's, Work Plan, bates labeling process; e-mail re agreements with Toeroek Associates, Administrative Record documents		
				9/10/2002



WAULT 748-000653-001



Barcode	Box#	Type of Document	Person(s)	Date Range]
		Affidavit sample, e-mail re privilege logs		9/30/2002	
		Outstanding cost issues	,		
		·]
748-000654-001	6	Articles/Lists of Exposed Individuals/Calendar Schedules			
		"Examination of Vermiculite for the Presence of Asbestos Fibres" by Eric J. Chatfield, et al. of Ontario Research Foundation		10/0/1979	
		Richard J. Lee's article, "Dust and Airborne Concentrations—Is There a Correlation?"		·	7
		Fowler and Price article, "Some Statistical Principles in Asbestos Measurement and their Application to Dust Sampling and Analysis"			1
		Revised Preliminary Draft by Versar, Inc. re Asbestos Exposure Assessment for Attic Vermiculite Insulation		6/28/2001 do	WAULT 748-00
		List of exposed individuals and their pertinent information			renewater de Heller Heller De Leville Heller E.
		Updated exposed individuals and their pertinent information		9/24/2001	
		Updated Sampling List - Libby Asbestos		11/14/2001	E STEMBLE IN SOCIALIST COLUMN TO ALL
		Updated Sampling List – Libby Asbestos		11/13/2001	1
		List of Properties to Be Sampled Category I		8/1/2001]
` .		Clinton Maynard action items		12/30/2001 - 4/10/2001]
		Duc Nguyen – schedule		8/13/2001 11/9/2001	
		Paul Peronard schedule		8/8/2001 - 11/16/2001	·
		Chris Weis - schedule		8/8/2001 - 8/10/2001	
		Updated Listening Summary – Libby Asbestos		11/13/2001	

748-000654-001

Barcode	Box#	Type of Document	Person(s)	Date Ra	ange	
748-000655-001	1	Motions / Pleadings / Court Filings		 		
146-000033-001		Defendants' Response to United States' First Set of Interrogatories, Requests for Production of	 			
	l	Documents, & Requests for Admission	ļ	1/23/2	t.	
	 	Defendants' Second Set of Interrogatories & Requests for Production of Documents		3/14/2	T	- 740 000055 004
		Defendant Kootenai Development Corporation's Answer re: Statement of the Case, Jurisdiction,		3/14/2	döMAUL	748-000655-001
\ .	1	Venue, and Defendants	,	6/43/3	Backerss Archites & Breside Manager	negel
<u> </u>		Defendant W.R. Grace & CoConn.'s Answer to the Allegations re: Statement of the Case,	ļ	6/12/2		11811¢1814±150£1116111.# 11°
1		Jurisdiction, Venue, and Defendants		6/12/20		
		Defendants' Third Set of Requests for Production of Documents		7/1/20	02 I	
	<u> </u>	United States' Designation of Rebuttal Expert Nelson H. Shapiro		9/25/20	002	
						•
	 	Defendants' Response to United States' Motion for Partial Summary Judgment on Response Costs				
	ĺ	and on Defendants' Second Affirmative Defense; Vol. 1 of 1		10/11/2	002,	
		United States' Motion for Partial Summary Judgment on Response Costs and on Defendants' Second				
İ		Affirmative Defense; Vol. 1 of 3 - Exhibits 1-22; Vol. 2 of 3 - Exhibits 23-30; Vol. 3 of 3 - Exhibits 31-42			· ·	
		<u> </u>		10/31/20	002	
				1		
		United States' Reply to Defendants' Response to Motion for Partial Summary Judgment on Response				
	İ	Costs and Defendants' Second Affirmative Defense		11/11/20	002	
		Order re: Scope and Standard of Review of United States' Reply to Defendants' Response to Motion			ļ	•
,	ŀ	for Partial Summary Judgment on Response Costs and Defendants' Second Affirmative Defense	ŀ	İ		
			ļ <u> </u>	11/13/20		
		Defendants' Supplemental Response to United States' Interrogatories		11/15/20	002	
*	i	Order re: Costs Incurred; Prejudgment Interest; Declaratory Judgment on Liability re: Subsequent			'	
		Response Costs or Damages		12/19/20	002	
		Draft Pretrial Order-Statement of the Case		<u> </u>		
748-000656-001	2	Motions / Pleadings / Court Filings		 	_	
7-40-000000-001		Defendants' Revised Proposed Findings of Fact and Conclusions of Law		12/3	ARWAULT	748-000656-001
		Defendants' Motion for Reconsideration		12/3	Business Archives & Bectards Management	
		Defendants' Revised Genuine Issues of Material Fact Including Fed.R.Civ.Proc. 56(f) Facts		123		BING CRING BAGGARDE IA 41:
		Discovered After October 31, 2002 Related to United States' Motion for Partial Summary Judgment on				
		Defendants' Third Affirmative Defense with Exhibits Vol. 1-11		12/31/20		/ By-Bar-Bar-Bar-Bar-Bar-Bar-Bar-Bar-Bar-Bar
·						
748-000657-001	3	Expert Reports / Rebuttal Reports				
			Tom Dahl, Wiley Wright, III,		MANAULT	748-000657-001
			Charles Young	L	Business Archives & Records Management	

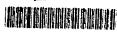
Barcode	Box#	Type of Document	Person(s)	Date Ra	nge
		Defendants' Rule 26(a)(2) Expert Disclosures with Attached Reports of Elizabeth L. Anderson, Suresh	Elizabeth Anderson, Suresh		
	i	Moolgavkar, Richard Bartelt, Eric Chatfield, Dale Jensen	Moolgavkar, Richard Bartlet, Eric		
	<u> </u>		Chatfield, Dale Jensen	<u></u>	
	L	Wiley Wright, III - Cost Report	Wiley Wright, III		
		Wiley Wright, III - Updated Exhibits & Expert Accounting Report	Wiley Wright, III		
		Charles Young Expert Witness Report & Supporting Documents	Charles Young		
		Defendants' Witness List			
		Exhibit Lists & Related Documents			
		Defendants' Exhibit List; Deposition Exhibit Lists & Related Documents; Exhibit Index for Libby			· · · · · · · · · · · · · · · · · · ·
		Asbestos Site; Miscellaneous Notes re: Exhibits & Voir Dire Information			
					740 000050 004
748-000658-001		Exhibit List & Related Documents			38WAULT 748-000658-001
		Plaintiffs' (Potential) Exhibits			Gusiness Arthires & Records Munagrossus
		La sollate			\$180,180,190,900 \$10,000,000 \$20,000 \$30,000 \$40,000 \$
748-000659-001		Depositions / Exhibits Market 1977			
650	$\overline{}$	Harry Eschenbach - Amendment to Deposition; Deposition Exhibits	Harry Eschenbach	10/18/20	<u>. </u>
		Julie Yang - Deposition Questions and Supporting Documents; Potential Julie Yang Deposition Exhibit	Julie-Yang		
		Report	<u> </u>		
	L	- Maybe 20 mes	100648		
748-000660-001	6	Depositions / Exhibits	DAYBN	XOIL	
\ /	,	Julie Yang - Depositions and Exhibits Vol. 7-5; Additional Julie Yang Deposition Documents	3	7 '	
\sim				<u> </u>	
				·	l
748-000661-001		Privilege Logs & Related Documents			740 000004 004
		W.R. Grace Initial Privilege Logs			3 48-000661-001
		Bankruptcy Privilege Logs (Toeroek Assoc.); Privilege Logs (Toeroek Assoc.)			Business Archives & Records Management
		List of Privilege Log #1 Missing Documents			A BERT MARTINE ROLL OF THE THE THE TREE FOR THE THE TREE THE THE
		Libby #2 Stamps for Document Review			
748-000662-001		Cost Documentation & Related Documents			· · ·
			Contractors; IAG; SAC	11/7/2	
		Direct Labor Charge Support	Toeroek Associates, Inc.	02/01/00 -	EXAULT 748-000662-001
		Costs (Itemized, Indirect, Regional & HQ Travel)		10/01/99 -	***AULT 748-000662-001
		Cost Documents for Remedial AR		11/19/:	Boulerys Archives & Bournes Management Amount 1: South the after 68 or 68 of
		Special Project/All Inclusive Report		10/01/99 -	
		All Inclusive Cost Report		10/01/99 -	HATTI OLD FROM AND DESTANDA VERTINES OF ON RELIGIOUS RELACT.
		<u> </u>			1
48-000663-001		Cost Documentation & Related Documents		<u> </u>	
		Itemized Cost Summary		10/01/99 -	WAULT 748-000663-001
		Enforcement Confi	dential		Beilnaus Auchbes & Russerfe Management



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		Original CRP Summaries		all time frames
		Regional Payroll		2000-2001
		HQ Payroll; Regional Travel		10/01/99 - 06/30/0
			ч	07/01/01 - 12/31/01
		Regional Travel .		07/01/01 - 12/31/01
		Regional Travel		07/01/01 - 12/31/01
748-000664-001	10	Cost Documentation & Related Documents		<u> </u>
		Regional Travel (Duc Nguyen; David Ostrander)		740 000004 004
		Regional Travel (Paul Peronard)		*************************************
		Regional Travel (Douglas Skie; Sam Vance; John Wardell; Chris Weis)		Qualitatis Archivey & Records Management
		Travel Vouchers (Chris Weis; David Williams; William Yellowtail)		
				THE TREE OF THE PARTY OF THE PA
748-000665-001	11	Cost Documentation & Related Documents		
		HQ Travel (Philip Campagna; Sandra Connors; John Gilbert; Joseph Lafornara; David Mickunas;		·
		Patricia Smith; Victoria VanRoden)		
		Travel (Oscar Tarrago; Maria Teran-Maciver; Glenn Tucker; Pam Tucker; Timothy Walker; Jill Welch;		
		John Wheeler; Sandra Whitehouse; Patrick Young; Danny Yu)		
		ATSDR Payroll; Travel Expense Reports (Steve Blackwell; Sharon Campolucci; Caroline Cusack;		MAULT 748-000665-001
		Steve Dearwent; Dan Holcomb; Myrna Lundy; Jeff Lybarger; Tom Mignone; Chris Poulet; Dan		Brilland Artishen & Records Management
		Strausbaugh) ATSDR Travel Vouchers (Sharon Campolucci; Steve Dearwent; Donna Garland; Dan Holcomb;		(Signification du période etcl à se essi eu etc éte. et de
		Wendy Kaye; Susan Kess; Michael Levin; Jeff Lybarger; Dan Middleton; Tom Mignone; Susan Muza;		
		Laura Northern; Chris Poulet; Oscar Tarrago)) #18/15/1/101/ QV: UTP #86/637 (FT): 41 TS 6: 2 E T).
		ATSDR Cost Recovery Time Sheet & Travel Vouchers; NORC Task Request Report; SRC Vouchers;		
Ì		CDC Supply/Service Orders		
		ATSDR Payroll Expense Report/Cost Recovery Time Sheets		
		Expense Reports, Travel Vouchers, Records of Activities, Website Info.; SRC Costs; ATSDR Health		
. [Consultation Reports; IAG - EPA & ATSDR; ATSDR Payroll Expenses Reports & Timesheets; SRC		
		Task Request		
				-
748-000666-001	12	Cost Documentation & Related Documents		740 00000 004
		Work Performed Documents; IAG - ATSDR Funding, Indirect, Timekeeping		748-000666-001
		Work Performed Documents - Toeroek Associates, Inc.; TechLaw, Inc.; USGS; ISSI		Bayloury Anthorn & Rocards Management
		VOLPE/DOT Progress Reports & Invoices		
		VOLPE/DOT Progress Reports & Invoices		I ARRIVAN MAR AN HER KIN KINA CISI KELI DA HER ARAN
		Work Performed Documents - Lockheed Martin; URS; IT Corp.		
48-000667-001	13	Cost Documentation & Related Documents	· · · · · · · · · · · · · · · · · · ·	
-10 00007-001		Cost Package Blowbacks of Images from CP Database	-	*************************************
		Control Contro		



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		Work Performed Documents - ARC; EMSL; ISSI - Misc. Costs			
		Work Performed Documents - EPA Indirect Rate Info.; POLREPS; Guidance Docs./Annual Allocation; Finance Work Papers	,		
		CRP - Toeroek Associates, Inc./ Purchase Vouchers & Services; IAG - EPA & DOI (USGS); Navy (ISSI) IAG; DOT/VOLPE IAG; ATSDR IAG		10/01/99 - 00	6/30/01
		START - URS / Vouchers, Annual Allocation Report; IT Corp. / Tech. Support & Site Eval.; DynCorp / Purchase Vouchers & Services; Apparatus Sales; ISSI / Costs; LeHigh Univ. / Invoices; Parkers Settlement (03/20/01); SRC / Invoices			
748-000668-001	14	Cost Documentation & Related Documents		<u> </u>	
		ATSDR / Travel Vouchers, Expense Reports, Time Sheets, IAG EPA & DHHS/ATSDR Payroll Expense Report, Cost Recovery Time Sheet; Lockheed Martin / Vouchers			EVAULT 748-000668-001
	<u> </u>	Travel Vouchers, Expense Reports, Time Sheets			Business Archivos & Records Management
		ATSDR / Supplements (Expense Reports, Time Sheets, Travel Vouchers)		07/01/01 -	
		ATSDR Supplement		5/28/2	
748-000669-001	15	Cost Documentation & Related Documents			1
		VOLPE Daily Reports			Tarana 740 000000 004
		Superfund Indirect Costs Rates			48YAULT 748-000669-001
		Work Performed List / Contractors	·	07/01/01 - 1.	Business Archives & Broards Management
748-000670-001	16	Corporate Report & Related Documents			 10 1
		Libby Asbestos Site Corporate Report	···•		
		Miscellaneous			740 000070 004
		Libby Asbestos Site Section 107 Referral and Related Documents			18 VAULT 748-000670-001
		DOJ Correspondence .			Business Archives & Bechalt Management
		Kelcey Land - Emails & Notes re: Libby (2 folders)			
		Sampling Plan - QAPP Revision 1		02/00	I TODATA CONTRACTOR IN TANGENT OF REAL PROPERTY OF THE PROPERT
748-000671-001	17	Miscellaneous			
		Comments re: EPA's Proposal to Place Libby, Montana on the National Priorities List (2 folders)		4/29/20	38YAULT 748-000671-001
		Action Memo Requesting Ceiling Increase (memo; transmittal; supporting documents)		4/25/20	Business Anchora & Business Attangument
748-000672-001		Miscellaneous			
		Minnesota Com Processors, LLC 104(e) Information Request Response		9/28/200	<u>면</u> 1
	•	Supplemental Documents from 10/12 Letter from Lund (Grace) re: 6th 104(e) Information Request			EVAULT 748-000672-001
		Miscellaneous Documents - Drafts & Research			@@#ULI /+0-0006/2-001



BOX #	Type of Document	Person(s)	Date Range
19			
			12/28/2001
	Drafts of EPA Response to Grace Comments re: Supplement to the Export/Screening Plant AR		
	EPA's Response to Comments re: 2nd Supplement to the Export/Screening Plant AR (research; supplemental documents; drafts)		48 VAULT 748-000673-0
	Attachments to EPA's Response to Comments Received on the 2nd Supplement to the		ARRING THE ARRIVE THE TREATMENT OF THE T
	Caselaw for EPA Response to Comments re: the 2nd Supplement to the Export/Screening Plant AR		
		,	
	CD 2)		<u> </u>
	SDMS Records Index - Export/Screeing Plant AR; Supplemental AR #1; Supplemental AR #2		
			— — — — — — — — — —
			38MAULT 748-000674-001
			Business Archives & Exxendy Management
			4/5 I MUNICIPAL REPORTED TO THE PROPERTY.
	Case Management Timeline		4/1
	Hazardous Substance Caselaw		
	Database Initial Comments		6/1/2001
21	Miscellaneous - CDs (Libby Asbestos Site)		
			•
			Recorded 02/11/02
			Recorded
	AR Supplement #1 - Index & Images (CD 1 - 9 coples; CD 2 - 11 copies)		Recorder de MAULT 749-000675 004
	Miscellaneous - CDs - Old Versions (missing action memos)		748-000675-00
			Released IIII III III III III III III III III
			Releaser Updated
	Export/Screening Plant - Document Index with Images		12/4/2001
	<u> </u>		12/4/2001
			12/4/2001
	20	Correspondence and Exhibits re: EPA Letter to Grace re: Grace Comments on Original AR (2 folders) Drafts of EPA Response to Grace Comments re: Supplement to the Export/Screening Plant AR EPA's Response to Comments re: 2nd Supplement to the Export/Screening Plant AR (research; supplemental documents; drafts) Attachments to EPA's Response to Comments Received on the 2nd Supplement to the Export/Screening Plant AR Caselaw for EPA Response to Comments re: the 2nd Supplement to the Export/Screening Plant AR 20 Miscellaneous Libby Supplement #2 - AR Index & Images (CD) Libby Export/Screening Plant AR Index & Images (CD 1); Supplemental AR #1 Index & Images (CD 1; CD 2) SDMS Records Index - Export/Screening Plant AR; Supplemental AR #1; Supplemental AR #2 Asbestos - Fiber Related Information (pictures; charts etc.) EPA Issue Tag Entry Sheets for Trial Database Special Collections Index / Public Document Index & Images (CD1; CD2; CD3; CD4) Site Assessment - Final Report re: Vermiculite Removal (Shilo, Manitoba) Case Management Timeline Hazardous Substance Caselaw Database Initial Comments	Correspondence and Exhibits re: EPA Letter to Grace re: Grace Comments on Original AR (2 folders) Drafts of EPA Response to Grace Comments re: Supplement to the Export/Screening Plant AR EPA's Response to Comments re: 2nd Supplement to the Export/Screening Plant AR (research; supplemental documents; drafts) Attachments to EPA's Response to Comments Received on the 2nd Supplement to the Export/Screening Plant AR Caselaw for EPA Response to Comments re: the 2nd Supplement to the Export/Screening Plant AR Caselaw for EPA Response to Comments re: the 2nd Supplement to the Export/Screening Plant AR Caselaw for EPA Response to Comments re: the 2nd Supplement to the Export/Screening Plant AR Libby Supplement #2 - AR Index & Images (CD) Libby Export/Screening Plant AR Index & Images (CD 1; Supplemental AR #1 Index & Images (CD 1; CD 2) SDMS Records Index - Export/Screening Plant AR; Supplemental AR #1; Supplemental AR #2 Asbestos - Fiber Related Information (pictures; charts etc.) EPA Issue Tag Entry Sheets for Trial Database Special Collections Index / Public Document Index & Images (CD1; CD2; CD3; CD4) Site Assessment - Final Report re: Vermiculite Removal (Shilo, Manitoba) Case Management Timeline Hazardous Substance Caselaw Database Initial Comments 21 Miscellaneous - CDs (Libby Asbestos Site) Export/Screening Plant AR - Index & Images (CD 1 - 1 copy) AR Supplement #1 - Index & Images (CD 1 - 9 copies; CD 2 - 11 copies) Miscellaneous - CDs - Old Versions (missing action memos) AR File / Export/Screening Plant AR Export/Screening Plant AR Export/Screening Plant AR Export/Screening Plant AR

Barcode	Box#	Type of Document	Person(s)	Date Range
	T	Miscellaneous- CDs (Libby Asbestos Site)		
		Invoice Database - Self-Executing (WA 2ESS-99-0018)		3/1/2001
	T	Invoice Database - Compatible w/ Access '97 (WA 2ESS-99-0018)		3/1/2001
		Invoice Database - Compatible w/ Access '00 (WA 2ESS-99-0018)		3/1/2001
		Libby Asbestos Database - Camp Dresser & McKee (V1-121201)		12/12/2001
	† 	Libby Version 1 Snapshot - Libby Asbestos DB Snapshot - Camp Dresser & McKee		12/23/2002
		Libby Asbestos DB Snapshot - Camp Dresser & McKee		3/15/2002
		Libby Asbestos DB Snapshot - Camp Dresser & McKee		5/6/2002
		Libby 2 Asbestos DB Snapshot - Camp Dresser & McKee		5/6/2002
		Libby 2 Asbestos DB Snapshot - Camp Dresser & McKee		8/5/2002
		Facilities CDs (1 set)		
		Releasable Grace DB CDs (2 sets)		
		Privilege Grace DB CDs (1 set)		
		CBI Grace DB CDs (1 set)		
		CBI-Priv DB CDs (1 set)		
		Database CDs - Fac. CBI-Priv; Fac. Releasable; CBI-Priv DB; CBI DB; Release 4 DB		
748-000676-001	22	Miscellaneous - Video Tapes (2 sets) & CD containing site pictures		
		Tape 1: Welcome - Keynote Part 1 & Part 2; Asbestos Related Illness; Long Term Health Care Q & A;		
		Asbestos and Loss; Risk Assessment		
		Tape 2: Cut 1: Smoking Cessation Session; Cut 2: Thursday Evening Keynote Session		
		Tape 3: Cut 1: Living with Asbestos Related Illness Session		
		Tape 4: Cut 1; Living with Asbestos Related Illness Session - Medical Aspects		
		Tape 5: Cut 1: Alternative Stress Management		749-000676 004
		Tape 6: Cut 1: EPA Site Assessments		- 28 WAULT 748-000676-001
		Tape 7: Cut 1: Occupational vs. Non-Occupational Exposure		(All Mark British and transfer by the see
		Tape 8: Cut 1: Information on Environmental Sampling		
		Tape 9: Cut 1: Asbestos Information for the Homeowner		TO THE TRANSPORT OF THE PROPERTY OF THE PROPER
		Tape 10: Cut 1: Asbestos & Children		
		Tape 11: Cut 1: Stress Management Workshop		•
		Tape 12: Cut 1: Medical Screening & Testing		
		Tape 13: Cut 1: Progress of Clean-Up Activities; Cut 2: What's Next After the Feds Leave Libby?; Cut		
		3: Conference Wrap-Up		
48-000677-001	23	Miscellaneous - VOLPE Supplemental Information copied by On-Site Sourcing		
	$ \overline{}$	1 audio cassette tape		1 48 MAULT 748-000677-001
		4 3 1/2" disks		Stational Architecture States Specialist
ı			· · · · · · · · · · · · · · · · · · ·	
		17 mini DV (digital video) cassettes		

	BOX INDEX - Set of 31 Delivered to DocuVault Nov			MAULT 748-000688-001		
Barcode	Box#	Type of Document	Person(s)	Burlierus Arthines & Records Management		
		17 VHS tape (same as Box #22)				
				FROM LANGE MAN AND HANGE CORE	NA PAR AN ARIUM ANTI OF AR	
748-000678-001	24	Miscellaneous - MAPS	1	I.	1 .	
		Libby, MT - Version 2 Database ERD / Libby 2				
		Fibers		d8WAULT	748-000678-001	
CA		Fiber Case Notes		Byriness Archhers E. Spennes Management		
161		Loading Facility, Export Plant, Screening Plant				
ملايل	/	Export Site				
The state of the s		1A Screening Plant		•		
		1B Screening Plant - Grid & Sampling Results Overlay		<i>—</i>		
		1C Screening with Grid, Results, Excavation Location & Soil Quantity		®YAULT	748-000686-001	
		2A KDC/Owen's Property - So. Of Parker's Property		doday	7-10-00000-001	
1		2B KDC/Owen's Property - So. Of Parker's Property		: Attach tilt de Ua it	. 21:11 G - 7:18 C × 15:4513: (\$ 4)	
T U		2C KDC/Owen's Property - So. Of Parker's Property with location EAC				
100		3A Loading Aerial		0.50% 0.50% 0.50% 0.50% 0.50% 0.50% 0.50% 0.50% 0.50% 0.50% 0.50% 0.50% 0.50% 0.50%	TOTAL OF A STATE OF THE STATE OF	
18 6		3B Loading Facilities with Locations				
- v ()		Figure 1: W.R. Grace Corporate Mergers & Reorganizations		d8WAULT	748-000687-001	
V 0			7	Business Auchbers & Begards Hanagement	•	
		(Boxes 25-31 are Matt Cohn's Documents)				
				(8D)(D)(10) 08145 H	HINI III BUNDING II IF IF	
748-000679-001		Motions / Pleadings / Court Filings (Matt Cohn's Box)				
		Order		9/6/200	<u>1</u>	
		Certification of Indices of Documents Comprising the Administrative Record (w/ attached indices)		9/16/200)2	
		Defendant's Notice of Deposition of James Millette		9/23/200)2	
		Declaration of Phillip D. Elbeck	Phillip D. Elbeck	9/25/200	02 :	
		Defendants' Statement of Genuine Issues of Material Facts Related to United States' Motion for Partial				
		Summary Judgment on Defendants' Third Affirmative Defense		10/31/20		
		Order re: Motion to Reschedule Pretrial Conference Date		11/12/20		
		Order re: Scope and Standard of Review		11/12/20	no	
		Defendants' Supplemental Response to United States' Interrogatories				
		Order re: Discovery and In Limine Motions		AZY8P	ULT 748-000679-001	
		Defendants' Revised Supplemental Response to United States' Interrogatories	•	Bulletti Archico & Sa	Cords MJAngement	
		Final Pretrial Order			ATRICIN ARADIA DISANTENTA DA ARRICA DE	
		Defendants' Notice of Deposition of Paul Peronard	·			
		United States' Submission of Proposed Findings of Fact and Conclusions of Law		1 441 401 144 4		
		United States' Notice of Filing the Proposed Findings of Fact and Conclusions of Law on the		1		
		Administrative Record and Liability and Costs		12/9/200		
		United States' Proposed Findings of Fact and Conclusions of Law (Liability and Costs)		12/9/200	2	

Barcode	Box#	Type of Document	Person(s)	Date Range
		Proposed Findings of Fact and Conclusions of Law (Administrative Record)		12/9/2002
		Defendants' Notice of Intent to Use CD-Rom Media for Exhibits (W.R. Grace and Kootenai		
	l	Development)		12/9/2002
		Defendants' Notice of Intent to Use Realtime Transcription (W.R. Grace and Kootenai Development)		
	L			12/9/2002
		Defendants' Submission of Proposed Findings of Fact and Conclusions of Law		12/9/2002
		Defendants' Proposed Findings of Fact and Conclusions of Law		12/9/2002
	1	Order		12/19/2002
		Defendants' Notice of Deposition of Chris Weis		12/20/2002
		Defendants' Revised Genuine Issues of Material Fact Including Fed.R.Civ.Proc. 56(f) Facts		
		Discovered After October 31, 2002 Related to United States' Motion for Partial Summary Judgment on	İ	
		Defendants' Third Affirmative Defense		12/31/2002
		Defendants' Motion for Reconsideration		12/31/2002
		Defendants' Revised Proposed Findings of Fact and Conclusions of Law		12/31/2002
		United States' Motion to Exclude the Testimony of Mr. Richard E. Bartelt	Richard E. Bartelt	12/31/2002
		Defendants' Response to United States' Motion for Clarification of December 19, 2002 Order	·	
				1/2/2003
,		Defendants' Response to United States' Supplemental Motion and Brief In Limine to Exclude the		
		Expert Testimony of Dale Jensen		1/2/2003
		Bankruptcy Filings		
		Drafts and Undated Documents	· · · · · · · · · · · · · · · · · · ·	
		F 4 Co 4 Co		-
		Expert Reports / Rebuttal Reports	F-i- Ob-W-14	0000000
		Eric Chatfield - Expert Report	Eric Chatfield	8/30/2002
			Greg Meeker	
		Dale R. Jensen - Expert Report	Dale R. Jensen	8/30/2002
748-000680-001	26	Expert Reports / Rebuttal Reports (Matt Cohn's Box)		
		Richard J. Lee - Expert Report with Supporting Documents	Richard J. Lee	7/2
**				
748-000681-001	27	Witness Files & Related Documents (Matt Cohn's Box)		Surbru Archive
		Greg Meeker	Greg Meeker	
		Defendant's Witness List		
		Plaintiff's Witness List		
		Exhibit Lists & Related Documents		
		Defendant's Exhibits (Lists) & Documents		dod
		Trial Exhibits		Outliness Archbers &
		Exhibit Information		



748-000680-001





748-000681-001



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Barcode	Box #	Type of Document	Person(s)	Date Range
		Depositions & Related Documents		
		Elizabeth Anderson	Elizabeth Anderson	
		Eric Chatfield	Eric Chatfield	
		Richard J. Lee	Richard J. Lee	
		Earl D. Lovick	Earl D. Lovick	
		James R. Millette	James R. Millette	
		Paul Peronard	Paul Peronard	
		Chris Weis	Chris Weis	
		Julie Yang -	Julie Yang	
		Charles Young	Charles Young	
		Deposition Notes		
748-000682-001	28	Dalait and a see 2 Dalated Day and 4 October 2 Day 2		
740-000002-001	20	Privilege Logs & Related Documents (Matt Cohn's Box) Defendant's Privilege Log & Related Documents	 	·
	 	Plaintiff's Privilege Log	 	740 000000 004
		Priamitiff's Privilege Log	 	
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		Cost Documentation & Related Documents Financial Information for Trial		TO THE REPORT OF THE PARTY OF T
		<u> </u>		04/01.
	ļ	IT Group Audits		02/00, (318) Print 10 12 12 12 13 14 15 15 15 15 15 15 15
		IAG Progress Report (DOT)	 	11/19/2002
	<u> </u>	RA Project Evaluation Form	 	2002
748-000683-001	29	Miscellaneous (Matt Cohn's Box)	 	
		Residential Tracking and Sampling Lists		
	·	List of Properties to be Sampled		_
		Sampling Information		- 48-000683-001
		Concordance Information		- 3. MAULT 748-000683-001
		Settlement Discussion Documents		Budiness Archives & Rycords Management
		FOIA Requests		
		Correspondence		- I MAN LINE FIRM DEPOSITOR FOR THE ABOVE HE WAS IN SEC.
		Notes & Pictures		
		Emails & Reports		
		Caselaw re: Exceptions to the Administrative Record		
748-000684-001		Miscellaneous (Matt Cohn's Box)		<u> </u>
		Material from the "Conference on Asbestos and Public Health"	L	749 000694 001
		Articles, Reports, Research		48VAULT 748-000684-001
		Phase 2 Sampling and Quality Assurance Project Plan (QAPP)- Revision 0		Burlines Archives & Records Management



Barcode	Box#	Type of Document	Person(s)	Date Range	
		Sampling and Quality Assurance Project Plan (QAPP)- Revision 1	·		
		Articles, Reports, Research			
748-000685-001	31	Miscellaneous (Matt Cohn's Box)			
		Comments re: Export/Screening Plant Removal Action Administrative Records & Related Documents		9/28 d8 3/	NULT 748-000685-001
		W.R. Grace Comments re: 05/02/02 Action Memo Amendment and Supplemental AR #2; Supplement			trong that and the sign bless de side de a side at dat
		to Comments re: Original and Supplemental ARs			
		Administrative Record Index - Export/Screening Plants, Supplement #1, Supplement #2		<u> </u>	31) 490 (100) 01 001 001 001 001 001 001 001 001
		Documents from Supplemental AR (5 folders)			•
	32-35	Privilege Documents			
		Privilege Documents (Libby #1)			•
	36-37	Privilege Documents		-	
		Privilege Documents (Libby #2)]	
	38	Privilege Documents			
		Privilege Documents (Libby #3)			
	39-95	Produced Documents			
				<u> </u>	

PRIVILEGED AND CONFIDENTIAL

Oil Discharge Exxon Mobil- Yellowstone River spill referred to the Department of Justice (Spill location – Yellowstone County, Montana)

On March 14, 2013, a referral was sent to the Department of Justice (DOJ) for Clean Water Act (CWA) violations related to ExxonMobil's July 1, 2011 discharge of approximately 1,509 barrels (63,378 gallons) of crude oil from its Silvertip Pipeline into the Yellowstone River that runs through the towns of Laurel and Billings, Montana. The Yellowstone River was at flood stage during the spill event causing significant impacts to wildlife (100 animals dead/ 155 oiled, cleaned and released); forcing the temporary closure of drinking water intakes; and impacting approximately 240 miles of river shorelines, floodplains, and riparian areas in varying degrees.

EPA responded to the incident, with On Scene Coordinators overseeing cleanup activities. On July 6, 2011, EPA issued an Administrative Order (AO) to ExxonMobil for cleanup under section 311(c) of the CWA, 33 U.S.C. § 1321(c). Montana issued a Letter of Violation to ExxonMobil on August 17, 2011 and subsequently an Administrative Order on Consent in early 2012, collecting a cash penalty and additional Supplemental Environmental Projects to be determined at a later date.

EPA's referral requests that DOJ file a civil action for penalties against ExxonMobil for discharging crude oil into waters of the United States in violation of section 311(b)(3) of the CWA, 33 U.S.C.§ 1321(b)(3), as amended by the Oil Pollution Act of 1990. Section 311(b)(3) of the CWA is non-delegable, meaning that EPA Region 8 enforces oil spill violations in all Region 8 states and Indian country.

Information only – no action required by the Regional Administrator

Program Contact: Inman.Donnak@epa.gov	303-312-6201
Legal Contact: Morris.brenda@epa.gov	303-312-6891
Darcy O'Connor, TEP Director	303-312-6392
Jennifer Schuller, TEP Supervisor	303-312-6334

	Date Mailed	Label/Addressee/Cert #	CC/DCC IIST	From	Ke:	Date Signed
	84	Richard (Rick) Smith, Owner Ladore Supper Club and Saloon P.O. Box 6044 Sheridan, WY 82802	Peggy Livingston Kathlene Brainich	US EPA, Region 8 Peggy Livingston, Attorney (MC 8ENF-L) 1595 Wynkoop Denver, CO 80202	EPA's Opposition to Motion to Dismiss to Ladore Supper Club	3/8/13
-		cert # 7009 3410 0000 2592 8444				
. 7	3/13/13	Mr. Dammon Frecker Red Desert Reclamation, LLC One Cate Street, Suite 100 Portsmouth, NH 03801 cert # 7009 3410 0000 2592 8444	n/a	US EPA, Region 8 Randy Lamdin (MC 8ENF-RC) 1595 Wynkoop Denver, CO 80202	RCRA with Tom Sitz	3/13/13
				·		
	Date Mailed	Label/Addressee/Cert #	cc/bcc list	From	1	Date Signed
m						
4	3/14/13	Richard (Rick) Smith, Owner Ladore Supper Club and Saloon P.O. Box 6044 Sheridan, WY 82802 cert # 7009 3410 0000 2592 8451	Peggy Livingston	US EPA, Region 8 Peggy Livingston, Attorney (MC 8ENF-L) 1595 Wynkoop Denver, CO 80202	Request to omit additional copies of docs from prehearing exchange	3/14/13
ro.	3/14/13	James F. Holmes, President Liquid Waste Management, Inc. P.O. Box 888 Longmont, CO 80501 cert # 7009 3410 0000 2598 4358	Amy Swanspon	US EPA, Region 8 Amy Swanson, Attorney (MC 8ENF-L) 1595 Wynkoop Denver, CO 80202	opportunity to confer, settlement communication, not admissible subject to federal rule of evidence	3/14/13
9	3/14/13	Ignacia S. Moreno, Assistant Attorney Genera United States Department of Justice Environment and Natural Resources Division P.O. Box 7611 Ben Franklin Station Washington, DC 20044-7611	Mark Pollins, Director Water Enforcement Division United States EPA Headquarters (2201 A) Ariel Rios Building 1200 Pennsylvania Avenue, N.W. Washington, D.C. 20460	Brenda Morris, Attorney (MC 8ENF-L) 1595 Wynkoop Denver, CO 80202	Yellowstone	3/14/13

`,

Date Mailed	Label/Addressee/Cert #	cc/bcc list	From	Re:	s
3/14/13		Pamela J. Mazakas OECA United States EPA Headquarters (2241 A) Ariel Rios Building			3/14/13
	•	1200 Pennsylvania Avenue, N.W. Washington, D.C. 20460			
3/14/13	·	Cynthia Giles OECA `United States EPA Headquarters (2201 A)			3/14/13
		Ariel Rios Building 1200 Pennsylvania Avenue, N.W. Washington, D.C. 20460			
P.O. Wolf	nelle's Pest Control Box 1304 point, MT 59201 ¥ 7009 3410 0000 2592 0585		Brenda Morris, Attorney (MC 8ENF-L) 1595 Wynkoop Denver, CO 80202	Resend Penalty Complaint & Notice of Opportunity for Hearing	
	·				
	· · · · · · · · · · · · · · · · · · ·			***************************************	
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1.					

S. COLEMAN – ATTORNEY WORK PRODUCT – DO NOT RELEASE

Direct Exam of Patrice K. (DRAFT)

Background

Name

Testified before in Federal Court? On what issues?

Current Employment/Title

- EPA – Director of the Fiscal Management and Planning Program within the Office of Technical Management Services

How many years have you been in this position?

- Employed with Region 8 for two years in this position, but employed with EPA for twelve years.

Describe employment history with EPA – held other positions?

- Employed with EPA for twelve years.
- Other Positions Held:

Current Responsibilities

- Supervise the Superfund Cost Recovery Team that compiles site-specific costs incurred by EPA in connection with a CERCLA response action into a cost report.

Recognition of Cost Report

- **Pull up Exhibit xx Revised Cost Report**
- **Have Patrice look at the Cherokee Site Cost Report**

What is Exhibit xx?

- Cost Report generated by EPA for the Cherokee Street Site

How do you recognize it as such?

- The subject line states that it is the full cost package report for the Cherokee Street site and it also lists the site identification number — which is #08SL. I supervised the work of staff that prepared the cost documentation packages and this cost summary report for Cherokee Street, completed a final review of the cost package report, and ultimately approved the cost package report.

What is the date of this cost report for the Cherokee Site?

- February 26, 2003

Is that your signature found next to the "from" caption on the document?

- Yes

Swanson, Amy

To:

Meredith, Sienna

Subject: Attachments:

Lambert Opportunity to Confer Letter 130314.Lambert.opptoconfer.fin.docx

Hi. Please take a look and make any changes you deem appropriate to the attached Lambert opportunity to confer letter. I'm pressed on time today to discuss Crow and Lame Deer, but am open Monday between 9:30 and 11:00 am. Can I call you then? Thank you,

Amy Swanson, Senior Attorney
Legal Enforcement Program (8ENF-L)
U.S. EPA Region 8
1595 Wynkoop Street
Denver, CO 80202-1129
Phone: (303) 312-6906

YBNIL

Barcode	Box#	Type of Document	Person(s)	Date Range	
748-000622-001	1	Pleadings and Exhibits in re Civil Action No. 01-72-M-DWM			740 00000
Λ		Exhibits for U.S.'s Motion for Partial Summary Judgment on Response Costs and on Defendants' Second		doWAULT	748-000622-001
一		Affirmative Defense (Volumes 1 and 3 / Exhibits 1 22, 31 42)		Southern Archives & Records Management	
A	-	U.S.'s Motion for Partial Summary Judgment on Defendant's Third Affirmative Defense and Exhibits 1 18			
A.T		U.S.'s Motion for Partial Summary Judgment on the Liability of W.R. Grace & CoConn. And on W.R. Grace & CoConn.'s First and Fourth Affirmative Defenses, Statement of Uncontroverted Facts, Brief in Support, Exhibit List, Volume 1 of 3: Exhibits (1 22)			
A		Exhibits for Second Affirmative Defense (Volume 3 of 3, Exhibits 31 – 42)			
A		U.S.'s Motion for Partial Summary Judgment on Defendant's Third Affirmative Defense, Brief in Support, Statement of Uncontroverted Facts, Exhibit List, Exhibits 1 18		10/11/2002	
A		Exhibits for U.S.'s Motion for Partial Summary Judgment on the Liability of W.R. Grace & CoConn. And on W.R. Grace & CoConn.'s First and Fourth Affirmative Defenses			
A.		U.S.'s Motion in Limine to Strike Portion of the Proposed Testimony of Dr. Richard J. Lee, Brief in Support, Proposed Order, Exhibit List, Exhibits 1 – 10		10/11/2002	*
A		HRO letter enclosing W.R. Grace & Co. privilege logs, Defendants' Response to U.S.'s Motion in Limine to Strike Portions of the proposed testimony of Dr. Richard J. Lee, Exhibits A, B, 1 – 35, Defendants' Response to U.S.'s Motion in Limine to exclude the Expert Report and Testimony of Dale Jensen, Exhibits 1 – 14		10/31/2002	
			····	10/31/2002	
748-000623-001	2	Documents for Civil Action No. 01-72-M-DWM	`		
A	-	Privilege log			
A		Final draft of ISO International Standard for ambient air — determination of numerical concentration of inorganic fibrous particles — scanning electron microscopy method		d®YAULT	748-000623-001
CF'		R.J. Lee Group ISO data compiled from EPA Excel Spreadsheets		Desiness Archives & Records Management	
- d		R.J. Lee Group Report: Analysis of January 2000 indoor and outdoor air samples			
		U.S. Motion for Partial Summary Judgment on Response Costs and on Defendants' Second Affirmative			ATAY NAT 1984 AND AND AND AND AND AND AND AND AND AND
<u> </u>		Defense (Volumes 1 – 3 / Exhibits 1 – 42)		11/2/2002	
748-000624-001	3	Pleadings for Various Actions/Reports/Correspondence/Deposition			
SF		Superfund reports/documents		6/0/1	
SF		Asbestos and health documents		WAULT	748-000624-001
ŠF		Fiber contamination of Vermiculites re Libby #1 — environmental research		Business Archives & Records Alanagous et	
SF		Libby #1 - Radiology Survey by Sebastien, et al., Cohort study of mortality		Para ser indicate and a servic	MARK AD ENGLISHE AL OF
54		Libby #2: Pleural effects			
55		Exposure to Crocidolite and Mesothelioma		טוטו נפפט	

Barcode	Box#	Type of Document	Person(s)	Date Range
A		Exposure to Tremolite and Respiratory Cancer in New Caldonia: A Case Control Study		0/0/2000
A		Progression of pleural and parenchymal disease		0/0/1997
A		Vermiculite Producers and Users		9/0/1988
54=		X-ray evidence of increased asbestos exposure		0/0/2000
SF		Internal fax re causality		8/12/2002
SF.		Internal fax re FOIA request in re CDC, NIOSH and ATSDR		8/22/2002
1]	Consolidated Arvin cases: CV-F-92-5068 OWW, CV-F-96-6226 OWW, and CV-F-96-6228 OWW		
A	L	Findings of Fact and Conclusions of Law_		5/24/2002
SF	<u></u>	CV-91-4098 EPA's Allocation Methodology re Non-site Specific Costs		10/15/1993
A		No. 4:97 CV 1557 CDP Memorandum and Order		9/15/1999
A		CV F 92-5373 Memorandum Opinionto Enforce Consent Decree		1/12/2000
A		W.R. Grace Interests		6/10/2002
SF		EPA's Response to 12/21/2002 Comments from W.R. Grace re the Supplement to the Export/Screening Plant AR		
SP		W.R. Grace's Comments		12/21/2001
SF		Attorney-Client Privileged Response to W.R. Grace's Comments received 7/31/2002		8/11/2002
SF		W.R. Grace miscellaneous correspondence		4/14/1969 7/15/1985
55		Superfund Audit Report – Phase 2 Sampling		5/15/2001
SF		Memo re Milwaukee Plant and MonoKote		8/1/1973
\Box A		U.S.'s Response to Defendants' Briefto reopen AR		10/22/2002
A		Civil Action No. 01-72-M-DWM HRO's request for progress report re costs		10/17/2002
A		U.S.'s Motion and Brief Requesting Leave to File Additional Factual Materials in Summary Judgment Replies		11/12/2002
A		U.S.'s Reply to Defendants' Response to Motion for Partial Summary Judgment on Response Costs and Defendants' Second Affirmative Defense, attachments and exhibits		11/11/2002
		Memos, testimony, report		3/13/2000 - 6/2/2002
A		Deposition of Arnold R. Brody		9/30/2002
SF		Tremolite report, HRO and DOJ correspondence re Civil Action No. 01-72-M-DWM		4/2/1985 10/11/2002
A		W.R. Grace's Motion to Reschedule Pretrial Conference Date and supporting Brief		10/24/2002
A		Memos, articles on asbestos		0/0/1993 10/1/2002
A		Unsigned U.S.'s Unopposed Motion and Brief of the U.S. to withdraw certain claims with prejudice		0/0/2002
A		Summary Report of particulate found after destruction of the World Trade Center		10/12/2001
A		Health-based Soil Investigation Levels - Australia		5/24/2002
A		<u>Civil Action No. 01-72-M-DWM (D. Mont.)</u> Defendants' Reply to the U.S.'s Response to Defendants' Brief re Order to Require EPA to Reopen the AR and exhibits		10/31/2002
A		U.S.'s Motion in Limine to Exclude the Expert Report and Testimony of Dale Jensen and exhibits and Brief and Proposed Order+B25		10/11/2002

Barcode	Box#	Type of Document	Person(s)	Date Range
		Documents in re Civil Action No. CV-00-167-M-DWM and Civil Action No. 4-88-822 and		
748-000625-001	4			
		Chapter 11, Case No. 01-01139(JKF)	·	1
~-		Civil Action No. CV-00-167-M-DWM		
-A		Notice		2/8/2001
		Defendants' Prediscovery Disclosure Statement		11/7/2000
		Order		3/9/2001
		U.S. Preliminary Pretrial Statement and draft thereof		<u> </u>
X		Joint Discovery Plan	· · ·	
A		Defendants' Motion to Transfer Venue to the District of Delaware	<u> </u>	7/17/2001
A		U.S.'s Unopposed Motion and Brief for Extension of Time to Respond to Defendants' Motion and Proposed Order		7/27/2001
A		W.R. Grace's Preliminary Pretrial Statement		8/29/2001
A		Order		9/6/2001
A		Defendants' Unopposed Motion for Conducting Preliminary Pretrial Conference by Telephone		10/4/2001
A		Proposed Order		10/0/2001
<u> </u>		Signed Order		10/5/2001
Δ		Notice of Lodging, Consent Decree		10/23/2001
<u> </u>		Signed Order re oral argument		12/5/2000
4	·	Signed Order re telephonic status conference		10/15/2001
A		Oral Argument Transcript of Proceedings between EPA and W.R. Grace		12/20/2000
				
Æ		Bankruptcy case documents in re Chapter 11, Case No. 01-01139(JKF)		5/10/2002
A		Bankruptcy case documents in re Chapter 11, Case No. 01-01139 and Case No. 01-01200		
A		Western Minerals Site map and sampling data (Rec of Comm)		3/27/2002
CF		Toeroek Analysis of W.R. Grace's Response to EPA's 6th 104(e) Information Request		9/5/2001
A		Measurement of Asbestos Air Pollution Inside Buildings Sprayed with Asbestos		8/0/1980 - 7/9/2001
A		Bureau of Mines report, "Selected Silicate Minerals and their Asbestiform Varieties" by Campbell, et al.		
D-		Expanding Plants information		6/14/1961 - 7/19/2000
^		ASTM International 2002 Johnson Conference: A Review of Asbestos Monitoring Methods and Results		
H		for the New York World Trade Center, etc.		7/21/2002 7/25/2002
SF		Raintree Nursery-Mel and Lerah Parker and family-miscellaneous letters, pictures, information		3/0/2000 — 4/28/2001
A		Civil Action No. 4-88-822 Access Case — Harris Jorgensen and Isabel Jorgensen v. Carey-Canada, Inc., et al. documents		
65		Fibers for Mark Raney		9/23/2002

SYAULT 748-000625-001

Barcode	Box #	Type of Document	Person(s)	Date Range
SF	7	Libby timeline		4/19/2002
<i>SF</i>	T	Summary of Agency Risk Issues for Libby, Montana ,		2/7/2002
A	T	Superfund Program Management		2/0/1995
5=	T	CERCLA original copies		

Barcode	Box#	Type of Document	Person(s)	Date Range	
		MATT'S MISCELLANEOUS BOXES			•
748-000626-001	1	Concordance slay at Touriek			-stain at
A		Adapter, Concordance Dataflight software, Concordance Information Retrieval System handbook, related manuals and guides			To expen
748-000627-001	2	Toeroek's CD's - stay at Tolink			740 00000000000
<i>A</i>		CD's of extra copies of Libby Site file		dodAULT	748-000627-001
<i>627</i> 748-000628-001	3	Duplicates from Libby Asbestos File Review			
5F		W.R. Grace's Comments to EPA's 3rd Action Memo with exhibits and attachments		E LUKARUM KUAN	EMINICAL DE LA FARENCIA DEL FARENCIA DE LA FARENCIA DEL FARENCIA DE LA FARENCIA D
748-000629-001	4	Deposition and Notes/Reports/Analyses/Operating Procedures			
SF		Deposition of Lee Lee Preliminary Report		ENAULT.	748-000629-001
SF		Standard Operating Procedures, core samples, soil samples, air samples, Silica analyses, SAED studies, deposition notes for Rich Lee, C. Weis and Meeker, analyses of air samples, Lee's Expert Report, ISO EDS reports, AHERA EDS reports, airborne asbestos methods, Asbestos Investigation grids, OSHA health effects and other files, RJLG-NVLAP, Lee CV and Publication List		7/18/1977 — 9/11/2002	
748-000630-001	5	Loose Documents		L CONTAIN -	748-000630-001
SF		Document database, briefs, reports, analyses, grids, letter re status of AR, test reports and results, memos, log of WRG's privileged documents		E Besieve Archives & Records Administration	/40-000030-00 I

Barcode	Box#	Type of Document	Person(s)	Date Range	<u> </u>
			1		7
delivered	Note- book	United States' Designation of Experts: Arnold R. Brody, Ph.D., James E. Lockey, M.D., MS, Gregory P. Meeker, James R. Millette, Ph.D., Fredric L. Quivik, Ph.D., Alan C. Whitehouse, M.D., Wiley Wright III, CPA, Charles Young		7/31/2002	
		This, they tright in, or 71, oriented roung	 	7.0 1.2002	┪
748-000631-001	1	Finstad v. W.R. Grace and Company	 		⊣
LA I		Employee Exposure Summaries		3/	748-000631-001
A	-	Finstad v. W.R. Grace and Company Transcript of Proceedings		3/ d8MAULT	740-000031-001
A		Finstad v. W.R. Grace and Company Appeal Exhibits Volumes I and II		, dis: sk. hm de si	e den part zona und, plr. für jabe: esk da
A		Finstad v. W.R. Grace and Company Transcript of Proceedings		5/6/199	
					PRECEED RESILEMENT SERVICE OF SER
748-000632-001	2	Employee Exposure Summaries			···
SF		Employee Exposure Summaries		3/	740 000000 004
				dowault	748-000632-001
748-000633-001	3	Corporate Documents		Besinese Archines & Saccode Masagement	All the live of the state of the
		W.R. Grace corporate documents Plaintiff's Brief in Opposition of Defendant's Motion to			
		Dismiss and exhibits	İ	9/ MARAKAN	HANDINE BET AND THE TITLE OF THE
A		W.R. Grace corporate documents S-4 Registration Statement under SEC Corporate fraudulent conveyance Plaintiff's Brief in Opposition of Defendant's Motion to		8/2/1996	1
N .				**	7
13		Dismiss	<u> </u>	1/13/2000	
<u> </u>		W.R. Grace & Co. Annual Report Form 10-K405		0/0/1007	1
Δ		NESHAPS documents Consent Decree, privileged documents, press releases		12/23/19	740 000000 004
A-		Fresenius Medical Care Holdings Inc./NY 10-K405		3/2 doca AUL	748-000633-001
A		Fresenius Medical Care Holdings Inc./NY 8-K		2/i Business Archives & Bacorda Manageme	•
4	,	Fresenius Medical Care Holdings Inc./NY 10-K405		3/! 8/:	
H		Sealed Air Corp/Delaware Registration Statement		8/: IMANA III	ERNINAUNITARINAN
50		Employee Exposure Summary		6/6/ । ੪੦ਹ	J
748-000634-001	4	Motions / Pleadings / Court Filings/Title Search]
SF		Libby Asbestos Site Draft Title Search Report by Toeroek Associates; Title Search documents: Sites #1-3, Appendix C Title Trees, Sites #4-5, Sites #1-4, Site #5, Figures		®MAULT	748-000634-001
7		Plaintiff's Brief in Opposition of Defendant's Motion to Dismiss for Lack of Personal		Business Archiers & Sacardo Abasagement ; d Dr. Jim frib: din Elit Bie	rect (1 - art : Styltt, et. 1).
A		Jurisdiction and exhibits			
					Titi (: 41 m/34: 41 e (14 e);

Barcode	Box#	Type of Document	Person(s)	Date Range	
748-000635-001	5	Corporate Documents — Colorado/New York/Montana Secretary of State and On-line			
A		Certificates of Merger, Agreement and Plan of Merger for Wayne Candies, Inc.; Pearce, Mayer & Greer, Inc.; Pix of America, Inc.; and other companies; Notices, Connecticut Secretary of State documents, Notice of Election or Appointment of Officer/Director	ō.	7/5 d8 YAULT 746	8-000635-001
A		W.R. Grace & Co. and Fresenius National Medical Care Holding, Inc. Forms 8-K, 10-K's, 10-Q's, Proxy Statements, Annual Reports, Independent Auditors' Consent Lincoln County District Court Defendant's Brief in Support of Motion to Dismiss for Lack of			
A		Personal Jurisdiction		4/26/1999	,
A		New York Secretary of State Application to do business in New York, Tax Commission certifications, Certificate of Merger, Certificates of Change and Amendment of Application of Authority, Certificate of Incorporation, Biennial Statements for W.R. Grace and Fresenius National Medical Care Holdings, Inc.		12/15/1999 3/0/2000	
K		Web site: - History, letter to Grace Shareholder, Libby Issues and Answer		4/9/1988	
A		Articles of Amendment, Articles of Merger, Articles of Organization for Delka Corporation, Certificates of Change of Address, Change of Directors, Massachusetts corporation Annual Report		12/9/1974 — 12/31/1998	
A		Denver Public Library: newspaper economic information on corporations, Montana Department of Environmental Quality Web Page		1960 2000	
[]A		W.R. Grace & Co. File Review Summary re Libby Asbestos Timeline of Events		1881 1999	
A		KnowX.com, www.prnewswire.com, www.nytimes.com Business reports on W.R. Grace & Co., Sealed Air Corporation, Fresenius Medical Care Holdings		11/28/2000 1/16/2001	· .
A		www.fmc-ag.com Business reports, tax background checks on W.R. Grace & Co., Sealed Air Corporation		11/28/2000 2/9/2001	
A		Sealed Air Corporation: General Shareholder Information, news releases, 1998 Annual Report; Abner v. Asbestos Defendants civil proceedings in San Francisco County, California		1998 4/27/2001	
- A-		Kootenai Development Company Annual Report	ļ	2000	
748-000636-001	6	Notebooks			\
4		Finstad v. W.R. Grace and Company Appeal Exhibits			
A		Workers Dead from Asbestos Disease Exhibit 225			
A		Finstad v. W.R. Grace and Company Transcript of Proceedings		5/3/19 d8 MAULT 7	48-000636-001
A		Marcor Remediation, Inc. Health and Safety Plan		Bulnes Archives & Records Management	
SF		Kootenai Development Company Flyway Property Final Removal Action Work Plan			
SF		Draft SAP for Remedial Investigation Contaminant Screening Study at Libby OU4			I FEITE III II II
51~		Kootenai Development Company Kootenai Bluff Property Final Removal Action Work Plan		712112001	*

Barcode	Box#	Type of Document	Person(s)	Date Range	
سيدم		Final Site Health and Safety Plan Screening Plant TO #4 prepared for U.S. Department of			
<u> </u>		Transportation	<u> </u>	6/20/2000	
748-000637-001	7	Specifications/Plans/Reports			-{
SF.		Libby Middle School Track Reconstruction Technical Specifications	·	10/12/2001	1
<f< td=""><td>-</td><td>Draft Libby Middle School Removal Action Work Plan</td><td></td><td></td><td>1</td></f<>	-	Draft Libby Middle School Removal Action Work Plan			1
35		Libby Asbestos Project Stimson Lumber Company Draft Sampling and Analysis Plan		1:10:0001	⊣
31		Libby High School Track Reconstruction Final Technical Specifications		1'	740 000607 004
5F		Final Screening Plant Removal Action Plan			748-000637-001
SF		Final Work Plan Kootenai Bluff		Besiness Archive & Recards Museument	
SE		Export Plant Final Removal Action Plan		ξ ' '	
3F		Revised Proposal Planning and Logistics and Field Office Setup		E SHIRID LONG PIRELL	MARKA BARANKAN MANALAK
SF		Screening Facility Final Removal Action Plan		8/14/2001	1
3F		OU4 Final Sampling and Analysis Plan - Contaminant Screening Study		4/0/2002]
SF		Records of Deviation/Request for Modification		4/4/2002	7
3F		March 2000 Sampling Effort		3/0/2000	
SF		Sample Results for Topsoil, Kalispell, Montana		5/15/2001	1
.5F		Final Report RES 75788 1 and 2 CDM Federal Programs Libby		7/18/2001	
SF		Health and Safety Plan Form Residential and Service Sampling		12/7/1999	1
35		Libby High School Equipment Replacement Summary Report		12/10/2001	7
SF		Site Visit Report by MWH		2/26/2002	1
SF		Project Work Plan Siefke and Browlee Properties		10/0/2001	
3F		Project Work Plan - Siefke and Browlee Properties - Addendum #1		10/0/2001	1
SF	_	Work Plan Phase I Assessment Libby		12/0/1999	
SF		Health and Safety Plan - Inventory and Cleanup		7/0/2001	
SF		Health and Safety Plan (former Railroad Loading Facility)		4/0/2001	
3F		Project Work Plan Inventory and Cleanup		7/0/2001	
748-000638-001	8	Depositions and Exhibits		·	
SF		Deposition and exhibits of Julie Yang		0/04/0000	,
35		Documents related to Julie Yang's depo			740 000620-001
H		Deposition and exhibits of Charles Young		d8WAULT	748-000638-001
SF		Documents sent to EPA to attach to Elizabeth Anderson's Report		9/3(Business Andreas & Street & Management	
_\$F		Documents sent to EPA to attach to William Hughson's Report			
		,			LL 40 SB: 05 OCC 414 FD 41:

Barcode	Box#	Type of Document	Person(s)	Date Range]
748-000639-001	9	Corporate Documents			
SF		B03 Lincoln County corporate documents, deeds		12	
CC		CO1 EPA - Purchase and Sale Contract with Kootenai Development Company, corporate	₽	48VAULT	748-000639-00
SF		documents	11	10/17/19! ************************************	, , , , , , , , , , , , , , , , , , , ,
56		CO2 - Zonolite corporate documents		3/1963 (####################################	le Harrico de las las las co
3F		CO4 W.R. Grace & Co. Annual Reports		197	
35		CO5 Delaware - Secretary of State corporate documents	ŢŢ	3/31/1990	1
SF		CO6 Connecticut Secretary of State corporate documents		5/31/1929 9/15/1969	
748-000640 <u>-0</u> 01	10	Expert Report/Pleadings			
SF		Fredric L. Quivik, Ph.D. Expert Report			·
		Defendant's Response to U.S.'s Motion for Partial Summary Judgment on Costs and on			48-000640-001
H		Defendant's Second Affirmative Defense		do graul!	46-000640-001
A		Plaintiff's Brief in Opposition to Defendant's Motion to Dismiss for Lack of Personal	 	Ambies Archives & Records Management 1 #101 (10) P.W. 42 (10) D.C. 10(1)	en en en en en en en en en en en en en e
~		Findings of Fact and Conclusions of Law re Motions of the Debtors and Asbestos Property			
P ₁		Damage Committee to Exclude Evidence	1	* MAZZ (AZA MAME) MAY (AZ - AZ) (AZ) (AZ) (AZ)	B11871816. 316. 31. 41
1.4					
748-000641-001	11	Corporate Reports/Agreements/Bankruptcy Brief/Title Search			
CE		Corporate Officers and Directors of W.R. Grace and Company and Associated Entities			
<u> </u>		prepared by Toeroek Associates		9/6/2001	
CE		Interim Corporate Report A B03 Lincoln County Clerk and Recorder deeds to Kootenai			
<u> </u>		Development Company	<u> </u>	11/31	·
CE		Interim Corporate Report B B03 Lincoln County Clerk and Recorder deeds to Kootenai	1	PWALLT 7	48-000642-001
		Development Company	<u> </u>	11/3(GOCKATOL #	10 0000 12 00 .
CVAL		Interim Corporate Report A C01 EPA Plaintiff's Brief in Opposition to Defendant's Motion	1	i a fa i lin i din din dia dia dia dia dia	Paratra de
1 7		to Dismiss for Lack of Personal Jurisdiction and exhibits			
ST		Purchase and Sale Contract between W.R. Grace and Company and Kootenai Development] [1 3057-10010100. 07-011 007-0114-01-01	99 (P) 131) 36P (P SS
		Company W.B. Constant Control of	 	10/17/1994	
A		W.R. Grace and Company's Informational Brief - Chapter 11 in Bankruptcy Court	 	4/12/2001	
A		Agreement and Plan of Reorganization between W.R. Grace and Company and Zonolite	}	0/04/0004	•
		Company	 	2/21/2001	
3/2		Libby Asbestos Site Draft Title Search Report by Toeroek Associates	 	2/21/2001	
ا مح		Preliminary Findings of W.R. Grace Corporate Structure by Toeroek Associates	<u> </u>	1/8/2001	

Barcode	Box#	Type of Document	Person(s)	Date Range	
		Interim Corporate Report B C01 EPA Plaintiff's Brief in Opposition to Defendant's Motion			
157		to Dismiss for Lack of Personal Jurisdiction and exhibits, Transaction Structure, Purchase] [
	ĺ	and Sale Contract between W.R. Grace and Company and Kootenai Development Company	1	10/17/1994 1/13/2000	
SF		Interim Corporate Report A - CO2 W.R. Grace and Company 1981 Facilities Audit		2/8/1982	1.
SF		Interim Corporate Report B CO2 W.R. Grace and Company 1981 Facilities Audit		2/8/1982	· .
^		Interim Corporate Report A CO4 www.freeedgar.com Registration Statement, Fresenius			7
H		Medical Care Holdings Inc./NY 10-K 1995		3/29/1996 3/13/1998	
0-		Interim Corporate Report A CO4 www.freeedgar.com W.R. Grace and Company 2000			
I.A		Annual Report		4/16/2001	
A		Fresenius Medical Care Holdings Inc./NY 1996 Annual Report		3/31/1997	
A		Interim Corporate Report B CO4 www.freeedgar.com - W.R. Grace and Company 2000	1		
		Annual Report	 	4/16/2001	
À		Sealed Air Corp/DE 2000 Annual Report	<u> </u>	3/23/2001	
- AT		Fresenius Medical Care Holdings Inc./NY 2000 Annual Report		4/2/2001	 -
<u> </u>		W.R. Grace and Company 2000 Annual Report		4/16/2001	
A		Interim Corporate Report B – CO4 www.freeedgar.com – W.R. Grace and Company	[. 2424222	
1		Registration Statement	<u> </u>	3/13/1998	-
- /3	· · · · · · · · · · · · · · · · · · ·	W.R. Grace and Company 1998 Annual Report		3/29/1999	
1414		Fresenius Medical Care Holdings Inc./NY 1995 Annual Report		3/29/1996	· ·
<u> </u>	1 42	Corporate Interim Reports			48-000641-001
748-000642-001	12	Corporate Interim Reports		d8 ya ult 7	40-00041-001
		Colporate interior Nepons		Ominess Archives & Barnels Madagement * After the Control of the	nati envitter (1. tr. st. di):
748-000643-001	13	Corporate Report/Trial Experts			
A		W.R. Grace Draft Interim Corporate Report			W. ab 193 lent an geg
		W.R. Grace's Designation of Experts		8/30/2002	7
		W.R. Grace's reports and rebuttal from the following experts: Elizabeth Anderson; EPA's			-
1 9F		Response to comment from Elizabeth Anderson; Henry Anderson, R.E. Bartelt, Eric Chatfield,			1
		Thomas, Dahl, G. Hughson, D.R. Jensen, Richard Lee, J. Lockey		OVALLET 7	48-000643-001
A		U.S.'s Designation of Experts			70-000070-00 1
		U.S.'s report and rebuttal from the following experts: Arnold Brody, James Lockey, Gregory		eto en en in tie tik tiel lei til	Der He Ha: it Gl.
SF		Meeker, Suresh Moolgavkar	1		
 		inconer, ourous mongaritas		e dithriften de this meir end eren au be fren fren	88 1 44 84 00 00 00 00 00 00 00 00 00 00 00 00 00
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Barcode	Box#	Type of Document	Person(s)	Date Range
748-000644-001	14	Rebuttal Experts		
70 1		U.S.'s reports and rebuttals from the following experts: James Millette, R.M. Turkewitz, Alan		48 YAULT 748-000644-001
SF	ĺ	C. Whitehouse, W.R. Wright, Charles Young	‡	7/2! - Sultern Rechirch Management
26		U.S.'s designation of rebuttal experts and rebuttal reports from: H. Anderson, R.J. Lee		A ARRIVER WITH AND A THICK ARE A PROBABILITY AND A THICK ARE
SY	1	Group, Inc., Gregory P. Meeker, James Millette, Rob Turkewitz	1	7/3
51-		Oral histories relied upon in Expert Report of Fredric L. Quivik, Ph.D. Folders 1-4		4/26/02 5/22/02
748-000645-001	15	Depositions and Exhibits		
<u>5</u> }		Elizabeth Anderson	<u> </u>	9/27/2002
SE		Richard Bartelt	<u> </u>	9/24/2002
51		David Croce	<u> </u>	0/27/2002
35		Stephen Dearwent, Jr.	<u> </u>	- TOTALLE 740 000645 004
54		Dannie Middleton		
35		Jeffrey Lybarger		Builness Archives & Raquedo Majazgravens
3		Harry Eschenbach		
- 5F		William Hughson	<u> </u>	AND SOLD FOR THE STATE OF THE S
5		William Hurley		0/10/2002
14		Dale Jensen		9/20/2002
SF		Kathleen Kirkland		9/6/2002
SF		Michele Koppelman	 	9/4/2002
748-000646-001	16	Depositions and Exhibits		
SE		Richard Lee File 2 of 2		7/00/0000
3E		James Lockey		748-000646-001
SE		John McGuiggin		dodauLi / 40-0000-0-001
36		Gregory Meeker		a differential in the first all the first all the first and the first an
5		James Millette	<u> </u>	
35		Eric Moeller		
<u>5</u> F		Sureh Moolgavkar		9/30/2002
SF		Mark Owens		8/16/2002
48-000647-001		Depositions		
<u>5</u>		Deposition of Paul Peronard		
571		Deposition of Fredric Quivik		748-000647-001
3E_		Deposition of Lester Skramstad	L	Businest Archives & Econols Management
3F		Deposition of Alan Stringer		1 #### AN THE THE THE REAL PROPERTY IN THE THE THE THE THE THE THE THE THE THE

Barcode	Box # Type of Document	Person(s)	Date Range
SF	Deposition of Timothy Wall		8/13/2002
2F	Deposition of Christopher Weis		9/12/2002
31	Deposition of Alan Whitehouse		9/6/2002
35	Deposition of Robert Wilkins		6/27/2002
SE	Deposition of Colette Wilson		9/17/2002
35	Deposition of Jack Wolter		9/12/2002
3F	Deposition of Wiley Wright		9/5/2002

Barcode	Box#	Type of Document	Person(s)	Date Range
748-000648-001	2	Julie Chi-Sun Yang, Ph.D. Depositions and Exhibits		
SE		17 depositions		12/20/1978 - 7/29/1998



748-000648-001

Barcode	Box#	Type of Document	Person(s)	Date Range		
		PRIVILEGED TRIAL PREPARATION		T rf		
748-000649-001	1	W.R. Grace Bankruptcy Privilege Logs		T /c	18 WA ULT	748-000649-001
A		Privilege logs		9/25/2	iarne Archives & Brounds Management	1.10.0000-19-001
					(Albabella adala)	ISTRITERAL TERRITORIA
748-000650-001	2	Trial Preparation				
A		Also labeled box 5 which is part of set of 31 boxes. See index for 31 boxes for contents			1	1000
\mathcal{H}	l	description.				
, -				I de	8WAULT	748-000650-001
748-000651-001	3	Trial Preparation			area Archiver & Estate Management	7-10-000050-001
5=		#11 Demos, Libby PPP1-Stereo-PLM.ppt		9/24/:	i HVAD PROBATER	VIII PELATERIA DE ALA
31		Graphics, graphs, #31 and #106 exhibits	·	12/9/:		
A	_	James Millette handwritten professional background as it relates to Libby		12/18/2002		: 00 12 000 1 4 (1 0 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
A		2 CD's: #12 and #36 Libby exhibits				
\mathcal{A}		Set 1: 2 of 2 invoices, time sheets		4/2/2000 - 1/2/20	002	
SE		Draft and finalized EPA's Response to Comments Received on the Second Supplement to the				
Jr J		Export/Screening Plant Administrative Record		6/24/1905		
		Holly Shook's memo and case law for EPA's Response to comments re Second Supplement to		1		
SF		Export/Screening Plant, diskette of Shook memo re answer to W.R. Grace's Interrogatory 31			ł	•
			<u> </u>	7/25/2002		
	 	Set 1: 1 of 2-Toeroek Associates timesheets				
H		Toeroek Associates correspondence and time sheets		2/7/2000 - 11/27/2	2002	
5		Dr. Eric J. Chatfield's Analysis re Vermiculite		9/4/2000		
P		Published articles on asbestos in dust		4/9/2002	. '	
		Case law				TAN 0000E4 004
51		Julie C. Yang, Ph.D. deposition		8/21/2002	UAW8 _b	LT 748-000651-001
55		Dr. Richard J. Lee deposition	·····	10/17/2000	Boulette Anchiros & Records	Management
		Handwritten notes for Trial Management Order re exhibits; draft TMO		<u> </u>		
A		Plan for Objections, exhibits, Libby database instructions		9/11/2002		
L 4		Correspondence with marginalia between attorneys re exhibits		11/25/2002	—	
A		Handwritten trial database basics		9/11/2002		
1 A		Print-outs from exhibits database		1976 9/18/200	2	
SF		Cause and effect trial preparation, Defendant's exhibits list, table of comments on certain				·
·	. —	2002 EPA Revised Scenario Samples		12/10/2002		
SF		Printed copies of cost effects slides, paper by Dr. Wylie re discriminating amphibole			1	
		cleavage fragments from asbestos, article re lung tumors and asbestos		6/17/1905		
A		Article by Dr. Chatfield re TEM specimens		8/0/1990		

Barcode	Box#	Type of Document	Person(s)	Date Range
4		Case law, EPA definition of hazardous substances under CERCLA		
2		Toeroek Associates' Initial Comments on document review		6/1/2001
A		Miscellaneous notes re exhibits and voir dire		4/3/1979 11/17/2002
A		Draft notes in preparaton of Chatfield deposition		
ST		Chatfield analysis of TEM asbestos samples		9/25/2002
A		Table of Lee deposition exhibits, case law, deposition notes for questioning		
SE		W.R. Grace memo re higher fiber counts with binder		8/22/1980
4		Order re Sealed Air Corporation's motion to extend expert reports deadline		8/21/2002
74		Deposition exhibit lists and related documents		5/9/2002 - 9/20/2002
748-000652-001	4	Reports/Studies/Testimony/Analyses		
		Handwritten notes		
A		Handwritten notes on Meeker and Millette Expert Reports, etc.		
1		Libby Asbestos Site Administrative Record Index, Libby trial database entry sheets Administrative		
		Record documents, Special Collections Index		11/11/2002
\mathcal{A}		Cost documentation for Remedial Administrative Record		11/19/2002
- A		Itemized Cost Summary (superceded)		10/1/1999 12/31/01
A		Draft memo to EPA from Toeroek Associates re Libby Personnel, handwritten notes		2/5/2001
A		EPA Work Performed lists		11/7/2002
4		Case law in 9th Circuit re exceptions to the Administrative Record		
A		Matt's trial exhibits - Kathleen Rest testimony		7/31/2001
35		Lee - EPA error sheets; Lee - List of exemplars of Count Sheets		7/6/2000 – 9/23 dod
SF		Letter from Michael Beard of EPA to Sally Sasnett of EPA re misrepresentation of analytical results		- Indian
		for asbestos in bulk materials		11/3/1992
\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	1	USA Today article by Lee re high levels of asbestos in dust are an indicator of the need for cleanup		
				2/12/2002
1		Bureau of Mines Health Study on asbestos dust		4/31973 4/12/1973
A		Health and Safety Report Asbestos Dust Survey Report		10/19/1971 10/21/1971
18		Chatfield report: "Asbestos Measurements in Workplaces and Ambient Spaces"		
		Data Comparison of asbestos fibers		
		Asbestos Fiber Reentrainment During Dry Vacuuming and Wet Cleaning of Asbestos-contaminated		
		Carpet		5/0/1991
5		Libby Sample Results Summary Report		8/13/2002
57		TEM Asbestos Structure Count		8/6/2001
SF		Phase 1 Quality Assurance Project Plan Environmental Monitoring for Asbestos		. 1/4/2000
<u>51-1</u>		Phase 2 Quality Assurance Project Plan Environmental Monitoring for Asbestos		3/0/2001



MAULT 748-000652-001



Barcode	Box#	Type of Document	Person(s)	Date Range
CE	1	W.R. Grace comments on Administrative Record for Export Plant and Screening Plant Removal		
<u> </u>		Actions and WRG letter to EPA		3/24/1983 - 2000
		A study of the Reproducibility of the Micro-Vac Technique by Hatfield, et al.	·	
		Asbestos in Public and Commercial Buildings by Health Effects Institute		1991
<u>5</u> F		W.R. Grace memo re controlled drop air sampling on 7/23/1976 and drop test results		8/5/1976
A		*A Modeling Approach to Estimate Community Exposures to Airborne Asbestos Concentrations from Reentrained Road Dust* by Kira Lynch		7/31/1995
SF		Resume and expert report by Gregory P. Meeker, "The composition of asbestiform amphiboleresultsanalysis"		7/31/2002
1	 	Comments on Proposed Rulemaking on Measuring and Controlling Asbestos Exposure		6/27/2002
<u> </u>		Kathleen Rest testimony re Workplace Exposure to Asbestos		7/31/2001
A	 	In USA Today by Lee - dust needs cleaning	 	2/12/2002
SC		Mel and Lerah Parker letter re tailing material from the roadway is a toxic hazardous material		1/20/2001
51		Photocopies of road photos from the Parkers		4/25/0000
31		Letter from Benjamin Wake to Public Health Service		9/12/1956
8		Christopher Weis/EPA letter to W.R. Grace re methodology for analysis		4/4/0000
5F	1	Chris Weis memo to Paul Peronard re residual contamination		5/17/2000
A		Memo re tremolite problem from Wood to Brookes, et al.		5/24/1977
.5=		W.R. Grace memo relightweight fertilizer customer fiber exposures		1/27/1978 - 2/15/1978
SF		Wylie's report, "Discriminating Amphibole cleavage fragments from Asbestos: Rationale and Methodology		11/0/1990
35		Julie C. Yang's report, "Characterization and Preparation of Respirable Sized Tremolite Fiber and Vermiculte for Animal Studies		4/8/1976
PX		Ahn, et al. report, "Microstructures and fiber-formation mechanisms of crocidolite asbestos		1991
55	1	Amandus, et al. report on vermiculite miners and millers exposed to tremolite-actinolite		1987
A		Department of the Interior "Contributions to Economic Geology" papers and reports		1928
A		Selected Silicate Minerals and their Asbestiform Varieties by Campbell, et al.		
512		Health Effects of Tremolite by Bruce Case		
51	1	Demos of amphiboles		
- 2	1	Meeker Administrative Report summary fo Libby amphibole mineralogy		7/3/2001
7	1	Veblen's report "Anthophyllite asbestos		1980
PX		Wylie's report, "The Habit of Asbestiform Amphiboles		
A Company	1 1	Phase contrast microscopy		5/20/1977
50	1	Yang's report, "Characterization"		4/8/1976
A	1	Deposition Notes: handwritten	****	
K		Drafts of EPA Response to W.R. Grace Comments re Supplement to Export/Screening Plant		

Barcode	Box#	Type of Document	Person(s)	Date Range
A		Miscellaneous notes and pictures, memos		
54.		Actual distributions		8/22/1980 - 0/0/2002
54		Fiber samples		
748-000653-001	5_	Defendant's Exhibits, Cost Recovery Backup		
		Tables of Defendant's Exhibits		11/26/2002
14		Exhibit Index for Libby Asbestos Site cost recovery litigation created by Toeroek Associates	T	11/18/2002
A		Tracking list for documents requested per Court Order to provide W.R. Grace with documents by 8/29/2001		
1/2		Letter from DOJ regarding Libby-related documents to be sent to the DOJ		3/15/2002
12 -		List of Affidavits for Libby #2		8/14/2002
P.		Production lists for Libby #1 and Libby #2		2001 - 2/4/2002
R		R8 letters		7/26/2001
 		HQ letters		7/20/2001
PAV .		Montana office letters		7/26/2001
1		Miscellaneous letters '		7/26/2001
1/2		EPA Production List		
A		Miscellaneous documentation, drafts, research		3/16/1981 10/23 7/16/2002
A		E-mail and correspondence re mobile lab analysis of TEM grids		7/16/2002
A		Handwritten notes and e-mail re cost documentation package and privilege log database		8/0/2001 - 5/20/
74		Handwritten note re things to do		
B		Concordance information		12/18/2002
7		Tasks lists		
74		Referral Report from EPA to DOJ re Libby #1		3/21/2001
A		Libby #1 Document Coding Sheet and documents		2001
\		EPA status update of Administrative Record to Holme, Roberts & Owen		7/24/2001
		Memo re legal research re "imminent and substantial endangerment"		8/9/2002
A		Draft letter to W.R. Grace re settlement discussions		12/10/2002
A		EPA memo re "no action" assurances		12/12/1995
A		Summary of U.S.'s document production		11/19/2002
54		Request for a Removal Action Ceiling Increase at Libby		7/12/2001
T.		Approval of Work Plan for W.R. Grace bankruptcy		5/28/2002
A		DOJ draft letter re contract costs and recovery		5/30/2002
7		E-mail re boxes of Libby documents, expert reports, scanning, CD's, Work Plan, bates labeling		
14.		process, e-mail re agreements with Toeroek Associates, Administrative Record documents		9/10/2002



748-000653-001



Barcode	Box#	Type of Document	Person(s)	Date Range	
A		Affidavit sample, e-mail re privilege logs		9/30/2002	
12		Outstanding cost issues			
748-000654-001	6	Articles/Lists of Exposed Individuals/Calendar Schedules			1
A		"Examination of Vermiculite for the Presence of Asbestos Fibres" by Eric J. Chatfield, et al. of Ontario Research Foundation		10/0/1979	
K		Richard J. Lee's article, "Dust and Airborne ConcentrationsIs There a Correlation?"			
A		Fowler and Price article, "Some Statistical Principles in Asbestos Measurement and their Application to Dust Sampling and Analysis"		, e	
SF		Revised Preliminary Draft by Versar, Inc. re Asbestos Exposure Assessment for Attic Vermiculite Insulation		6/28/2001 do	YAULT 748-000654-001
51-		List of exposed individuals and their pertinent information			conditional agent for the telephone file for the file of the file
3F		Updated exposed individuals and their pertinent information		9/24/2001	
35		Updated Sampling List – Libby Asbestos	-	11/14/2001	1 detaile fatt des de ried ried is ber 1 te bet anne anne an
3		Updated Sampling List Libby Asbestos		11/13/2001	
35		List of Properties to Be Sampled – Category I		8/1/2001	
3/2		Clinton Maynard action items		12/30/2001 4/10/2001	
		Duc Nguyen schedule		8/13/2001 - 11/9/2001	
A		Paul Peronard - schedule		8/8/2001 11/16/2001	
A		Chris Weis schedule		8/8/2001 8/10/2001	
51		Updated Listening Summary - Libby Asbestos		11/13/2001	

BOX INDEX - Set of 31 Delivered to DocuVault November 2006

Barcode	Box#	Type of Document	Person(s)	Date Range	• .
748-000655-001	1	Motions / Pleadings / Court Filings		<u>-</u>	
\sim		Defendants' Response to United States' First Set of Interrogatories, Requests for Production of	,		•
		Documents, & Requests for Admission		1/23/2	¬
A		Defendants' Second Set of Interrogatories & Requests for Production of Documents		3/14/2	AULT 748-000655-001
N		Defendant Kootenal Development Corporation's Answer re: Statement of the Case, Jurisdiction,		U U G	to broade transporters
M		Venue, and Defendants	1	6/12/2	arrenne i men etanta ellet S.E. ich d'a lite il S. et. Al
A	1	Defendant W.R. Grace & CoConn.'s Answer to the Allegations re: Statement of the Case,			
		Jurisdiction, Venue, and Defendants	.1	6/12/21	CHAIND CON TRICKS HEATEN CENTER ON INCHES OF A
A		Defendants' Third Set of Requests for Production of Documents		7/1/2002	
		United States' Designation of Rebuttal Expert Nelson H. Shapiro		9/25/2002	
					•
		Defendants' Response to United States' Motion for Partial Summary Judgment on Response Costs			
		and on Defendants' Second Affirmative Defense; Vol. 1 of 1	<u> </u>	10/11/2002	
•		United States' Motion for Partial Summary Judgment on Response Costs and on Defendants' Second			
A		Affirmative Defense; Vol. 1 of 3 - Exhibits 1-22; Vol. 2 of 3 - Exhibits 23-30; Vol. 3 of 3 - Exhibits 31-42	2	Į į	
				10/31/2002	
					•
A		United States' Reply to Defendants' Response to Motion for Partial Summary Judgment on Response			
<u></u>		Costs and Defendants' Second Affirmative Defense	<u> </u>	11/11/2002	
Α .		Order re: Scope and Standard of Review of United States' Reply to Defendants' Response to Motion	9		
A		for Partial Summary Judgment on Response Costs and Defendants' Second Affirmative Defense		1	
			<u></u>	11/13/2002	•
		Defendants' Supplemental Response to United States' Interrogatories	<u> </u>	11/15/2002	
$1 \Lambda I$		Order re: Costs Incurred; Prejudgment Interest; Declaratory Judgment on Liability re: Subsequent			
10		Response Costs or Damages		12/19/2002	
K		Draft Pretrial Order-Statement of the Case			
				<u> </u>	
748-000656-001		Motions / Pleadings / Court Filings			ULT 748-000656-001
A		Defendants' Revised Proposed Findings of Fact and Conclusions of Law		12/3· dod.	JET /40-000000-001
4		Defendants' Motion for Reconsideration		12/3 Business Archives & Born	de Stangement
7		Defendants' Revised Genuine Issues of Material Fact Including Fed.R.Civ.Proc. 56(f) Facts	-		
4		Discovered After October 31, 2002 Related to United States' Motion for Partial Summary Judgment on	1		N F DK JAK HER HILL 1971 1941 1941 1941 1941 1941 1941 1941
		Defendants' Third Affirmative Defense with Exhibits Vol. 1-11		12/31/2002	
					•
748-000657-001		Expert Reports / Rebuttal Reports			
1			Tom Dahl, Wiley Wright, III,	do MA L	ILT 748-000657-001
71			Charles Young	Burjineys, Arthory & Recard	s Municipality

Barcode	Box#	Type of Document	Person(s)	Date Ra	nge	
^		Defendants' Rule 26(a)(2) Expert Disclosures with Attached Reports of Elizabeth L. Anderson, Suresh	Elizabeth Anderson, Suresh	I		
\mathcal{L}		Moolgavkar, Richard Bartelt, Eric Chatfield, Dale Jensen .	Moolgavkar, Richard Bartlet, Eric	İ		
			Chatfield, Dale Jensen			
		Wiley Wright, III - Cost Report	Wiley Wright, III			
14		Wiley Wright, III - Updated Exhibits & Expert Accounting Report	Wiley Wright, III			
At-		Charles Young Expert Witness Report & Supporting Documents	Charles Young			
2		Defendants' Witness List				
		Exhibit Lists & Related Documents				
A		Defendants' Exhibit List; Deposition Exhibit Lists & Related Documents; Exhibit Index for Libby				
P		Asbestos Site; Miscellaneous Notes re: Exhibits & Voir Dire Information			Ĭ	
748-000658-001	4	Exhibit List & Related Documents			BYAUL	r 748-000658-001
12		Plaintiffs' (Potential) Exhibits			GOCKA CE	
- P		A di la d			i din die ichi de	
748-000659-001	5	Depositions / Exhibits Mushum 1977				
		Harry Eschenbach - Amendment to Deposition; Deposition Exhibits	Harry Eschenbach	10/18/20	RIMATIAN W	IN HER DEN DANGER BELONGER EN AND
650	—— <i>-</i>	Julie Yang - Deposition Questions and Supporting Documents; Potential Julie Yang Deposition Exhibit		10/10/20	<u></u>	
\smile		Report	Julie-rang			
		Пероп	14000 00641			
748-000660-001	<u></u>	Depositions / Exhibits - Mary Mary 124 mary		70		
40-000000001		Julie Yang - Depositions and Exhibits Vol. 1-5; Additional Julie Yang Deposition Documents	DOJBN	Neg		
\ /		Palle Faily Depositions and Extitions Vol 1-3, Additional Jolie Fail Deposition Documents	1	-	1	
			<u> </u>			
748-000661,001	7	Privilege Logs & Related Documents			'	
40-00000 (001		W.R. Grace Initial Privilege Logs				748-000661-001
- /X-		Bankruptcy Privilege Logs (Toeroek Assoc.); Privilege Logs (Toeroek Assoc.)			®YAULT	/ 40- 000001-001
		List of Privilege Logs (10eroex Assoc.), Frivilege Logs (10eroex Assoc.)			Berlants Archives & Bezonio Management	
		Libby #2 Stamps for Document Review				
- FT		Libby #2 Stamps for Document Review				NATA BLANCK INCOMENTAL
48-000662-001		Cost Documentation & Related Documents				
LA T		EPA Work Performed Lists	Contractors; IAG; SAC	11/7/2^^		
1		Direct Labor Charge Support	Toeroek Associates, Inc.	02/01/00 -		740 000660 001
<i>P</i> t		Costs (Itemized, Indirect, Regional & HQ Travel)		10/01/99 -	dayault	748-000662-001
A		Cost Documents for Remedial AR		11/19/;	Barbicus Archives & Records Management	
14		Special Project/All Inclusive Report		10/01/99 -		
A		All Inclusive Cost Report		10/01/99 -		
48 000663 004		Cont Desumentation & Related Desuments		·		
48-000662-001		Cost Documentation & Related Documents Itemized Cost Summary		10/01/99 -		748-000663-001



Barcode A	Box #	Type of Document	Person(s)	Date Range	
K		Original CRP Summaries		all time frames	
14		Regional Payroll		2000-2001	
D.		HQ Payroll; Regional Travel	и.	10/01/99 - 06/30/0	
<i></i>				07/01/01 - 12/31/01	·
A		Regional Travel		07/01/01 - 12/31/01	
A		Regional Travel	·	07/01/01 - 12/31/01	· ·
48-000664-001	10	Cost Documentation & Related Documents			
 		Regional Travel (Duc Nguyen; David Ostrander)			740 000004 004
1		Regional Travel (Paul Peronard)		d8WAULT	748-000664-001
		Regional Travel (Douglas Skie; Sam Vance; John Wardell; Chris Weis)		Business Archives & Records Mustagement	
		Travel Vouchers (Chris Weis; David Williams; William Yellowtail)			
, ,					KWRBKKWH
48-000665-001	11	Cost Documentation & Related Documents			
		HQ Travel (Philip Campagna; Sandra Connors; John Gilbert; Joseph Lafornara; David Mickunas;			
_ 4		Patricia Smith; Victoria VanRoden)		_1.	•
		Travel (Oscar Tarrago; Maria Teran-Maciver; Glenn Tucker; Pam Tucker; Timothy Walker; Jill Welch;			•
A		John Wheeler; Sandra Whitehouse; Patrick Young; Danny Yu)		<u> </u>	
∧ 3 1		ATSDR Payroll; Travel Expense Reports (Steve Blackwell; Sharon Campolucci; Caroline Cusack;		VALII T	748-000665-001
A		Steve Dearwent; Dan Holcomb; Myrna Lundy; Jeff Lybarger; Tom Mignone; Chris Poulet, Dan		Driver Arther A Street Management	7-40-000000-001
		Strausbaugh)		i din ide die eine eine eine	Birt a 18 ani dec dis. Son. 22 sid.
\sim 1		ATSDR Travel Vouchers (Sharon Campolucci; Steve Dearwent; Donna Garland; Dan Holcomb; Wendy Kaye; Susan Kess; Michael Levin; Jeff Lybarger; Dan Middleton; Torn Mignone; Susan Muza;			
A		Laura Northern; Chris Poulet; Oscar Tarrago)		100001010000000000000000000000000000000	603 187 P.C. PR. CO. 144 18 11.
'^- +		ATSDR Cost Recovery Time Sheet & Travel Vouchers; NORC Task Request Report; SRC Vouchers;			•
μ		CDC Supply/Service Orders		1	
A		ATSDR Payroll Expense Report/Cost Recovery Time Sheets			
		Expense Reports, Travel Vouchers, Records of Activities, Website Info.; SRC Costs; ATSDR Health			
A l		Consultation Reports; IAG - EPA & ATSDR; ATSDR Payroll Expenses Reports & Timesheets; SRC	•	1	
70		Task Request		ļ	
8-000666-001	12	Cost Documentation & Related Documents	·		740 000000 004
		Work Performed Documents; IAG - ATSDR Funding, Indirect, Timekeeping		d8WAULT	748-000666-001
IX		Work Performed Documents - Toeroek Associates, Inc.; TechLaw, Inc.; USGS; ISSI		Beplanes Archives & Records Management	
14		VOLPE/DOT Progress Reports & Invoices			MINGINALIA CO
1/2		VOLPE/DOT Progress Reports & Invoices	<u> </u>		
1		Work Performed Documents - Lockheed Martin; URS; IT Corp.			·
8-000667-001	13	Cost Documentation & Related Documents			
		Cost Package Blowbacks of Images from CP Database			748-000667-001



Barcode	Box#	Type of Document	Person(s)	Date Ran	nge
A		Work Performed Documents - ARC; EMSL; ISSI - Misc. Costs			
2		Work Performed Documents - EPA Indirect Rate Info.; POLREPS; Guidance Docs./Annual Allocation; Finance Work Papers			
A	-	CRP - Toeroek Associates, Inc./ Purchase Vouchers & Services; IAG - EPA & DOI (USGS); Navy (ISSI) IAG; DOT/VOLPE IAG; ATSDR IAG		10/01/99 - 06	/30/01
A		START - URS / Vouchers, Annual Allocation Report; IT Corp. / Tech. Support & Site Eval.; DynCorp / Purchase Vouchers & Services; Apparatus Sales; ISSI / Costs; LeHigh Univ. / Invoices; Parkers Settlement (03/20/01); SRC / Invoices			
748-000668-001	14	Cost Documentation & Related Documents	<u> </u>		
A		ATSDR / Travel Vouchers, Expense Reports, Time Sheets, IAG EPA & DHHS/ATSDR Payroli Expense Report, Cost Recovery Time Sheet; Lockheed Martin / Vouchers			EVAULT 748-000668-001
		Travel Vouchers, Expense Reports, Time Sheets			Suninces Archives & Records Manageneral
		ATSDR / Supplements (Expense Reports, Time Sheets, Travel Vouchers)		07/01/01 -	406 VID CID: ON THE FIGURE FALLER \$2 (12:14) \$4 (1)
- A		ATSDR Supplement		5/28/2	
748-000668-001	15	Cost Documentation & Related Documents		· · · · · · · · · · · · · · · · · · ·	. 1
1		VOLPE Daily Reports			T 740 00000 004
爱		Superfund Indirect Costs Rates			48MAULT 748-000669-001
7		Work Performed List / Contractors		07/01/01 - 1.	Buciarss Archives & Bronets Management
•					: 8 (1) (10) (10) (10) (10) (10) (10) (10)
748-000670-001	16	Corporate Report & Related Documents			
5F		Libby Asbestos Site Corporate Report			
		Miscellaneous			
SE		Libby Asbestos Site Section 107 Referral and Related Documents			8WAULT 748-000670-001
R		DOJ Correspondence		<u> </u>	Builders Archives & Becords Management
A		Kelcey Land - Emails & Notes re: Libby (2 folders)			4 A FE TO TO THE AN A SECRETARIZED AS SERVICES A SECOND SECURITIES A SECOND
57		Sampling Plan - QAPP Revision 1		02/00	
48-000671-001	17	Miscellaneous		-	
ST		Comments re: EPA's Proposal to Place Libby, Montana on the National Priorities List (2 folders)		4/29/20	**WAULT 748-000671-001
37		Action Memo Requesting Ceiling Increase (memo; transmittal; supporting documents)		4/25/20	Business Anthree & Broards Management
48-000672-001	18	Miscellaneous		<u> </u>	
A		Minnesota Com Processors, LLC 104(e) Information Request Response	·	9/28/2001	· nem ermeinen um internation bei traffe fie bil ift. fil. fil.
CE		Supplemental Documents from 10/12 Letter from Lund (Grace) re: 6th 104(e) Information Request		3/23/2001	1
<u> </u>		Miscellaneous Documents - Drafts & Research			## AULT 748-000672-001
		minocontinocate production Digital & Hosbardii			Suniverse Architers & Records Management



Barcode	Box#	Type of Document	Person(s)	Date Range	•
±1, 1					
48-000673-001	19	Miscellaneous			
SF		Correspondence and Exhibits re: EPA Letter to Grace re: Grace Comments on Original AR (2 folders)		12/28/2001	•
SF		Drafts of EPA Response to Grace Comments re: Supplement to the Export/Screening Plant AR			1
SF		EPA's Response to Comments re: 2nd Supplement to the Export/Screening Plant AR (research; supplemental documents; drafts)		dod.	AULT 748-000673-00
SF		Attachments to EPA's Response to Comments Received on the 2nd Supplement to the Export/Screening Plant AR			
A		Caselaw for EPA Response to Comments re: the 2nd Supplement to the Export/Screening Plant AR			dere more in man eine bei, bere ber mittel tie befre få 2. 92 ft.
18-00067 <u>4-</u> 001	20	Miscellaneous			
SF	· · · · · · · · · · · · · · · · · · ·	Libby Supplement #2 - AR Index & Images (CD)			•
SF		Libby Export/Screening Plant AR Index & Images (CD 1); Supplemental AR #1 Index & Images (CD 1; CD 2)			
SF		SDMS Records Index - Export/Screeing Plant AR; Supplemental AR #1; Supplemental AR #2			
.57		Asbestos - Fiber Related Information (pictures; charts etc.)			
A		EPA Issue Tag Entry Sheets for Trial Database		UAW8b	LT 748-000674-001
51		Special Collections Index / Public Document Index & Images (CD1; CD2; CD3; CD4)		Springer, Archives & Eccurde M	Programme Company Comp
A		Site Assessment - Final Report re: Vermiculite Removal (Shilo, Manitoba)		4/3 110701	h domensulativande en en en en en en en en en en en en en
		Case Management Timeline		4/1	
		Hazardous Substance Caselaw ,			er en abiliani angarang angarang angarang angarang angarang angarang angarang angarang angarang angarang angara
A		Database Initial Comments		6/1/2001	,
8-000675-001	21	Miscellaneous - CDs (Libby Asbestos Site)			
1		Export/Screening Plant AR - Index & Images (CD 1 - 1 copy)		Recorded 02/11/02	
台		AR Supplement #2 - Index & Images (4 copies)		Recorded	
		AR Supplement #1 - Index & Images (CD 1 - 9 copies; CD 2 - 11 copies)		Recorder Recorder	,
		THE COPPOSITION OF MILES COPPOSITION OF THE COPPOSI		HARVAU	LT 748-000675-001
A +		Miscellaneous - CDs - Old Versions (missing action memos)		Professor Aschines & Sacorda	/ 70-0000/5-007
4		AR File / Export/Screening Plants		Releaser	######################################
7		Export/Screening Plant AR		Updated	
2-		Export/Screening Plant - Document Index with Images		12/4/2001	m. navernaminen: 10 fellight
7		Export/Screening Plant AR		12/4/2001	
		Export Screening Plant - Document Index		12/4/2001	

Barcode _	Box#	Type of Document	Person(s)	Date Range	
4		Miscellaneous- CDs (Libby Asbestos Site)			
4		Invoice Database - Self-Executing (WA 2ESS-99-0018)		3/1/2001	
4		Invoice Database - Compatible w/ Access '97 (WA 2ESS-99-0018)		3/1/2001	
Z		Invoice Database - Compatible w/ Access '00 (WA 2ESS-99-0018)		3/1/2001	
W.	<u> </u>	Libby Asbestos Database - Camp Dresser & McKee (V1-121201)	-	12/12/2001	
1		Libby Version 1 Snapshot - Libby Asbestos DB Snapshot - Camp Dresser & McKee		12/23/2002	
7		Libby Asbestos DB Snapshot - Camp Dresser & McKee		3/15/2002	
7		Libby Asbestos DB Snapshot - Camp Dresser & McKee		5/6/2002	
B		Libby 2 Asbestos DB Snapshot - Camp Dresser & McKee		5/6/2002	
H		Libby 2 Asbestos DB Snapshot - Camp Dresser & McKee		8/5/2002	
4		Facilities CDs (1 set)			
De		Releasable Grace DB CDs (2 sets)			
A		Privilege Grace DB CDs (1 set)			
4		CBI Grace DB CDs (1 set)			
1		CBI-Priv DB CDs (1 set)			
4		Database CDs - Fac. CBI-Priv; Fac. Releasable; CBI-Priv DB; CBI DB; Release 4 DB			
			•		
748-000676-001	22	Miscellaneous - Video Tapes (2 sets) & CD containing site pictures			
		Tape 1: Welcome - Keynote Part 1 & Part 2; Asbestos Related Illness; Long Term Health Care Q & A;			
K		Asbestos and Loss; Risk Assessment			
		Tape 2: Cut 1: Smoking Cessation Session; Cut 2: Thursday Evening Keynote Session			
		Tape 3: Cut 1: Living with Asbestos Related Illness Session			
		Tape 4: Cut 1: Living with Asbestos Related Illness Session - Medical Aspects			
7		Tape 5: Cut 1: Alternative Stress Management		WAULT 748-000676-	004
17		Tape 6: Cut 1: EPA Site Assessments		Section A descript Advances	100
14		Tape 7: Cut 1: Occupational vs. Non-Occupational Exposure		All the Will Audi will and the same and and	
		Tape 8: Cut 1: Information on Environmental Sampling			
202		Tape 9: Cut 1: Asbestos Information for the Homeowner		a untersten einen ann versineren beziehen beit dem bild ibt bild.	
7.5		Tape 10: Cut 1: Asbestos & Children			
1/2		Tape 11: Cut 1: Stress Management Workshop			
2		Tape 12: Cut 1: Medical Screening & Testing			
·À		Tape 13: Cut 1: Progress of Clean-Up Activities; Cut 2: What's Next After the Feds Leave Libby?; Cut 3: Conference Wrap-Up			
748-00067 Z -001	23	Miscellaneous - VOLPE Supplemental Information copied by On-Site Sourcing		740 0000	. 004
		1 audio cassette tape			-001
<u> </u>		4 3 1/2" disks		Broine-s Archives & Broards Management	
		17 mini DV (digital video) cassettes			
A		28 CDs (according to enclosed transmittal letter, there should be 35 CDs)			

/		BOX INDEX - Set of 31 Delivered		®WAULT	748-000688-001
Barcode	Box#	Type of Document	Person(s)	Berlieria Archives & Staturda Mininggenesis e di haveth, trata may tribu have	that we did not the second of the
A		17 VHS tape (same as Box #22)			
748-000678-001	24	Miscellaneous - MAPS		I	1
5/2		Libby, MT - Version 2 Database ERD / Libby 2			T40 0000T0 004
51/		Fibers		d8WAULT	748-000678-001
5		Fiber Case Notes		Emines Archiver & Seconds Management	
		Loading Facility, Export Plant, Screening Plant		and a substitute of the substi	ITALINAM PAURULA IA AL
435	,	Export Site			
512		1A Screening Plant			•
133		1B Screening Plant - Grid & Sampling Results Overlay			
194		1C Screening with Grid, Results, Excavation Location & Soil Quantity		SYAULT	748-000686-001
_ 38_		2A KDC/Owen's Property - So. Of Parker's Property		dodiau	7-10-00000 001
1136		2B KDC/Owen's Property - So. Of Parker's Property		: Atomica Arabina in Marie Marie (Marie III)	. 2011 C.S. 2015 C.M. 2014 M.
0 428		2C KDC/Owen's Property - So. Of Parker's Property with location EAC			
40 5		3A Loading Aerial .		1 233 15 122 2010: 111	HEREI DER BYN DROCCE: BREC TO AN
1854		3B Loading Facilities with Locations		<u></u>	
V 5 (A)		Figure 1: W.R. Grace Corporate Mergers & Reorganizations .		devault	748-000687-001
100				Beniers Action & Groods Hamppelon	
		(Boxes 25-31 are Matt Cohn's Documents)			
				#	H 1077 B. B. DE REFERENCE FOR THE BOT
748-000679-001	25	Motions / Pleadings / Court Filings (Matt Cohn's Box)			
P		Order .		9/6/200	1
		Certification of Indices of Documents Comprising the Administrative Record (w/ attached indices)		9/16/200	02
LX:		Defendant's Notice of Deposition of James Millette		9/23/200)2
74-		Declaration of Phillip D. Elbeck	Phillip D. Elbeck	9/25/200)2
Λ'		Defendants' Statement of Genuine Issues of Material Facts Related to United States' Motion for Partial			
		Summary Judgment on Defendants' Third Affirmative Defense		10/31/20	02
		Order re: Motion to Reschedule Pretrial Conference Date		11/12/20	
4		Order re: Scope and Standard of Review		44/40/00/	m l
		Defendants' Supplemental Response to United States' Interrogatories			
		Order re: Discovery and In Limine Motions		AV. de Maria	ULT 748-000679-001
A I		Defendants' Revised Supplemental Response to United States' Interrogatories		Business Archives & Ro	Comfit Management
1		Final Pretrial Order		141	HATA KING ARA ANG KAKANIN KAKARA BAGABA PAKAN KAN
Ar I		Defendants' Notice of Deposition of Paul Peronard			
14		United States' Submission of Proposed Findings of Fact and Conclusions of Law		1	- '
7.		United States' Notice of Filing the Proposed Findings of Fact and Conclusions of Law on the			
		Administrative Record and Liability and Costs		12/9/200	2
		United States' Proposed Findings of Fact and Conclusions of Law (Liability and Costs)		12/9/200	2

Barcode	Box#	Type of Document	Person(s)	Date Range
		Proposed Findings of Fact and Conclusions of Law (Administrative Record)		12/9/2002
. 1/\		Defendants' Notice of Intent to Use CD-Rom Media for Exhibits (W.R. Grace and Kootenai		
		Development)	<u> </u>	12/9/2002
		Defendants' Notice of Intent to Use Realtime Transcription (W.R. Grace and Kootenai Development)		
<i>P</i> 1	L			12/9/2002
A		Defendants' Submission of Proposed Findings of Fact and Conclusions of Law		12/9/2002
H		Defendants' Proposed Findings of Fact and Conclusions of Law	·	12/9/2002
1		Order		12/19/2002
D		Defendants' Notice of Deposition of Chris Weis		12/20/2002
A		Defendants' Revised Genuine Issues of Material Fact Including Fed.R.Civ.Proc. 56(f) Facts Discovered After October 31, 2002 Related to United States' Motion for Partial Summary Judgment on		
		Defendants' Third Affirmative Defense		12/31/2002
		Defendants' Motion for Reconsideration		12/31/2002
		Defendants' Revised Proposed Findings of Fact and Conclusions of Law		12/31/2002
7		United States' Motion to Exclude the Testimony of Mr. Richard E. Bartelt	Richard E. Bartelt	12/31/2002
A		Defendants' Response to United States' Motion for Clarification of December 19, 2002 Order		1/2/2003
4		Defendants' Response to United States' Supplemental Motion and Brief In Limine to Exclude the		
		Expert Testimony of Dale Jensen		1/2/2003
A		Bankruptcy Filings		
A		Drafts and Undated Documents		
4		,		
- 14		Expert Reports / Rebuttal Reports		
37		Eric Chatfield - Expert Report	Eric Chatfield	8/30/2002
		Greg Meeker - Expert Report / Notes	Greg Meeker	
) 		Dale R. Jensen - Expert Report	Dale R. Jensen	8/30/2002
7				
48-000680-001	26	Expert Reports / Rebuttal Reports (Matt Cohn's Box)		
SF		Richard J. Lee - Expert Report with Supporting Documents	Richard J. Lee	7/2
				död
748-000681-001	27	Witness Files & Related Documents (Matt Cohn's Box)		Eurlana Archive
54		Greg Meeker	Greg Meeker	· · · · · ·
Δ.		Defendant's Witness List		
1/4		Plaintiff's Witness List		
		Exhibit Lists & Related Documents		
.4		Defendant's Exhibits (Lists) & Documents		dŏd
4		Trial Exhibits		Guiness Archives &
A		Exhibit Information		1 1
				1.



748-000680-001





748-000681-001



Barcode	Box#	Type of Document	Person(s)	Date Range
CF.		Depositions & Related Documents		
37		Elizabeth Anderson	Elizabeth Anderson	
35		Eric Chatfield	Eric Chatfield	
3/-		Richard J. Lee	Richard J. Lee	
5		Earl D. Lovick	Earl D. Lovick	
SF		James R. Millette	James R. Millette	
SF		Paul Peronard	Paul Peronard	
37		Chris Weis	Chris Weis	
SI		Julie Yang	Julie Yang	
3F SF		Charles Young	Charles Young	
		Deposition Notes		
740 000000 004				
748-000682-001	28	Privilege Logs & Related Documents (Matt Cohn's Box)		
	<u> </u>	Defendant's Privilege Log & Related Documents		
μ	ļ	Plaintiff's Privilege Log		
				Business Archives & Broads Management
		Cost Documentation & Related Documents		LOGGRAD BEBLAN END AN ELD AND AND AND AND AND AND AND AND AND AN
		Financial Information for Trial		04/01.
		IT Group Audits		02/00,
		IAG Progress Report (DOT)		11/19/2002
	<u> </u>	RA Project Evaluation Form		2002
48-000683-001	29	Miscellaneous (Matt Cohn's Box)		
51		Residential Tracking and Sampling Lists		-
32		List of Properties to be Sampled		
25		Sampling Information		740 000600 001
-2/-		Concordance Information		
冗		Settlement Discussion Documents		Business Archives & Seconds Municipental
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A		Correspondence		
-		Notes & Pictures		-
A		Emails & Réports		<u> </u>
A		Caselaw re: Exceptions to the Administrative Record		
48-000684-001	30	Miscellaneous (Matt Cohn's Box)		
		Material from the "Conference on Asbestos and Public Health"		740 000004 004
		Articles, Reports, Research		
SF		Phase 2 Sampling and Quality Assurance Project Plan (QAPP)- Revision 0		Burlancy Archivery & Bernrely Management
	· · · · · · ·	Finase 2 Sampling and Quality Assurance Floject Flan (QAFF) Revision 0		

Barcode	Box#	Type of Document	Person(s)	Date Range	
51		Sampling and Quality Assurance Project Plan (QAPP)- Revision 1			,
P		Articles, Reports, Research			
748-000685-001	31	Miscellaneous (Matt Cohn's Box)			
5		Comments re: Export/Screening Plant Removal Action Administrative Records & Related Documents		9/28 d8 WAU	LT 748-000685-001
3 F		W.R. Grace Comments re: 05/02/02 Action Memo Amendment and Supplemental AR #2; Supplement to Comments re: Original and Supplemental ARs			
A		Administrative Record Index - Export/Screening Plants, Supplement #1, Supplement #2		1884)	BIRTO ON TOXABLE HAVE CONTACT AND TAXABLE LINE OF SECTION OF CONTACT AND SECTION OF CONTACT
The state of the s		Documents from Supplemental AR (5 folders)		<u> </u>	
· .	32-35	Privilege Documents			
P		Privilege Documents (Libby #1)			
	36-37	Privilege Documents			
Ц		Privilege Documents (Libby #2)			•
	38	Privilege Documents		1.	
A		Privilege Documents (Libby #3)			
	39-95	Produced Documents			